

EXHIBIT C

EASTERN PROFIT CORP LIMITED vs STRATEGIC VISION US, LLC
French Wallop on 02/12/2019

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 EASTERN PROFIT CORPORATION LIMITED,
5 Plaintiff-Counterclaim Defendant,
6 Case No.
7 -against- 18-cv-2185 JGK
8 STRATEGIC VISION US, LLC,
9 Defendant-Counterclaim Plaintiff,
10 vs.
11 GUO WENGUI a/k/a, MILES KWOK,
12 Counterclaim Defendant.

13 -----X

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16 VIDEOTAPED DEPOSITION

17 OF

18 FRENCH WALLOP

19 New York, New York

20 Tuesday, February 12, 2019

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<p style="text-align: right;">Page 2</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6 Tuesday, February 12, 2019</p> <p>7 9:58a.m.</p> <p>8</p> <p>9</p> <p>10 Videotaped Deposition of FRENCH WALLOP, at</p> <p>11 the offices of Zeichner, Ellman & Krause LLP,</p> <p>12 1211 Avenue of the Americas, New York, New York,</p> <p>13 before Roberta Caiola, a Shorthand Reporter and</p> <p>14 Notary Public within and for the State of New</p> <p>15 York.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX</p> <p>2 WITNESS: FRENCH WALLOP PAGE</p> <p>3 BY: MR. GRENDI 8</p> <p>4 BY: MS. TESKE 292</p> <p>5</p> <p>6 LIST OF EXHIBITS</p> <p>7 WALLOP DESCRIPTION PAGE</p> <p>8 Exhibit 1 Notice of Deposition 24</p> <p>9 Exhibit 2 Document Bates stamped 27</p> <p>10 Eastern 000017</p> <p>11 Exhibit 3 Document Bates stamped 30</p> <p>12 SVUS000077</p> <p>13 Exhibit 4 Document entitled 41</p> <p>14 "Three-Year Timeline" Bates</p> <p>15 stamped SVUS000080</p> <p>16 Exhibit 5 Handwritten document 65</p> <p>17 Exhibit 6 Document entitled "Time to 73</p> <p>18 Get Them Beginning the</p> <p>19 Psycho-Political Campaign</p> <p>20 For China"</p> <p>21 Exhibit 7 Document entitled "1: Anita 84</p> <p>22 Yiu Suen"</p> <p>23 Exhibit 8 Research Agreement, 107</p> <p>24 January 1, 2018</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 A P P E A R A N C E S:</p> <p>2</p> <p>3 ZEICHNER, ELLMAN & KRAUSE LLP</p> <p>4 Attorneys for Eastern Profit Corporation Limited</p> <p>5 1211 Avenue of the Americas</p> <p>6 New York, NY 10036</p> <p>7 BY: ZACHARY GRENDI, ESQ.</p> <p>8 zgrendi@zeklaw.com</p> <p>9</p> <p>10 HODGSON RUSS LLP</p> <p>11 Attorneys for Guo Wengui a/k/a, Miles Kwok</p> <p>12 605 Third Avenue, Suite 2300</p> <p>13 New York, New York 10158</p> <p>14 BY: ERIN N. TESKE, ESQ.</p> <p>15</p> <p>16 PHILLIPS LYTLE LLP</p> <p>17 Attorneys for Strategic Vision US, LLC</p> <p>18 340 Madison Avenue</p> <p>19 New York, New York 10173-1922</p> <p>20 BY: JOSEPH B. SCHMIDT, ESQ.</p> <p>21 jschmidt@phillipslytle.com</p> <p>22</p> <p>23 ALSO PRESENT:</p> <p>24 YVETTE WANG (Morning session only)</p> <p>25 JAYSUN LOUSHIN, The Videographer</p>	<p style="text-align: right;">Page 5</p> <p>1 LIST OF EXHIBITS</p> <p>2 WALLOP DESCRIPTION PAGE</p> <p>3 Exhibit 9 Research Agreement dated 126</p> <p>4 December 29, 2017</p> <p>5 Exhibit 10 Signal messages, Bates 186</p> <p>6 stamped Eastern-0000201</p> <p>7 Exhibit 11 Background Report on Qing 226</p> <p>8 Yao</p> <p>9 Exhibit 12 Signal message thread 228</p> <p>10 Exhibit 13 Letter dated February 23, 241</p> <p>11 2018</p> <p>12 Exhibit 14 Document Bates stamped 247</p> <p>13 SVUS000040 and SVUS000041</p> <p>14 Exhibit 15 Document entitled "Line-Item 251</p> <p>15 Budget 1 Month Projected</p> <p>16 Cost Analysis" Bates stamped</p> <p>17 SVUS260</p> <p>18 Exhibit 16 Invoice from Allied Special 254</p> <p>19 Operations Group, Bates</p> <p>20 stamped SVUS000262</p> <p>21 Exhibit 17 Document Bates stamped 257</p> <p>22 SVUS000272 to SVUS000277</p> <p>23 Exhibit 18 Document entitled "Subject 260</p> <p>24 Chart," Bates SVUS000278</p> <p>25</p>

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<p style="text-align: right;">Page 6</p> <p>1 LIST OF EXHIBITS</p> <p>2 WALLOP DESCRIPTION PAGE</p> <p>3 Exhibit 19 Strategic Vision's Responses 262</p> <p>4 and Objections to</p> <p>5 Plaintiff's First Set of</p> <p>6 Interrogatories</p> <p>7 Exhibit 20 Strategic Vision's 271</p> <p>8 Supplemental and Amended</p> <p>9 Response and Objections to</p> <p>10 Plaintiff's First Set of</p> <p>11 Interrogatories</p> <p>12 Exhibit 21 Amended Answer and 275</p> <p>13 Counterclaims</p> <p>14 (Exhibits retained by Counsel.)</p> <p>15</p> <p>16 (*r) DOCUMENTS REQUESTED:</p> <p>17 Page: 118 11</p> <p>18 Page: 253 22</p> <p>19 Page: 273 6</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 FRENCH WALLOP, called as a witness, having been</p> <p>2 first duly sworn by a Notary Public of the State</p> <p>3 of New York, testifies as follows:</p> <p>4 EXAMINATION BY</p> <p>5 MR. GRENDI:</p> <p>6 Q. Good morning, Ms. Wallop. I'm Zach</p> <p>7 Grendi, as you just heard, counsel for Eastern</p> <p>8 Profit. I'm just going to be asking you some</p> <p>9 questions today.</p> <p>10 Just for the courtesy of the court</p> <p>11 reporter and the clarity of the record, I'm just</p> <p>12 going to ask that, please wait until after I</p> <p>13 finish asking a question to answer it. Unlike in</p> <p>14 normal conversation, in a deposition you need to</p> <p>15 allow one person to stop talking and the other</p> <p>16 person to start.</p> <p>17 Also, shrugs and nods are things that</p> <p>18 the court reporter can't take down, so I ask that</p> <p>19 you please answer all questions verbally. And if</p> <p>20 you need a break, just let me know, let anyone</p> <p>21 know, we can take one. We're going to try to</p> <p>22 move through this – these materials as quickly</p> <p>23 as possible, but breaks are allowed.</p> <p>24 A. Thank you.</p> <p>25 Q. What's your full legal name?</p>
<p style="text-align: right;">Page 7</p> <p>1 THE VIDEOGRAPHER: Good morning. This</p> <p>2 is the beginning of media 1 in the</p> <p>3 deposition of French Wallop, in the matter</p> <p>4 of Eastern Profit Corporation Limited versus</p> <p>5 Strategic Vision US, LLC.</p> <p>6 Today's date is February 12, 2019. My</p> <p>7 name is Jaysun Loushin, I am the</p> <p>8 videographer, and the court reporter is</p> <p>9 Roberta Caiola. We are here with Huseby</p> <p>10 Global Litigation.</p> <p>11 Counsel, please introduce yourself,</p> <p>12 after which the court reporter will swear in</p> <p>13 the witness. The time on the monitor is</p> <p>14 9:58.</p> <p>15 MR. GRENDI: Good morning. I'm Zach</p> <p>16 Grendi. I'm counsel for Eastern Profit</p> <p>17 Corporation. My law firm is Zeichner,</p> <p>18 Ellman & Krause.</p> <p>19 MR. SCHMIDT: Joe Schmidt from Phillips</p> <p>20 Lytle, on behalf of Strategic Vision as well</p> <p>21 as the witness, French Wallop.</p> <p>22 MS. TESKE: Erin Teske with Hodgson</p> <p>23 Russ, on behalf of third-party defendant</p> <p>24 Miles Kwok.</p> <p>25</p>	<p style="text-align: right;">Page 9</p> <p>1 A. French Carter Wallop.</p> <p>2 Q. And where do you reside?</p> <p>3 A. 1557 North 22nd Street, Arlington,</p> <p>4 Virginia 22209.</p> <p>5 Q. And –</p> <p>6 A. And I also have a Wyoming address.</p> <p>7 Q. Do you have a Las Vegas address?</p> <p>8 A. Yes.</p> <p>9 Q. Where is that?</p> <p>10 A. It's on Lakes Avenue. It's – it's</p> <p>11 where we use as our agent for the LLC for</p> <p>12 Strategic Vision.</p> <p>13 Q. So that's Strategic Vision's address –</p> <p>14 A. Yes.</p> <p>15 Q. – in Las Vegas?</p> <p>16 A. Not personal.</p> <p>17 Q. Okay. What's your educational</p> <p>18 background?</p> <p>19 A. Where would you want to start?</p> <p>20 Q. You can start in the beginning, but –</p> <p>21 A. Kindergarten?</p> <p>22 Q. – no need to go into great depth.</p> <p>23 Just an overview, if that's all right.</p> <p>24 MR. SCHMIDT: From college up.</p> <p>25 A. I went to a school in Switzerland for</p>

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<p style="text-align: right;">Page 10</p> <p>1 four years. And then I was at the Ecole 2 D'Interpretes in Geneva. And then I came back to 3 Georgetown University and got my linguistic's 4 degree in simultaneous interpreting. 5 Q. Anything else? 6 A. I did – I didn't finish, but I went to 7 SAIS, The School of Advanced International Study, 8 which is part of Johns Hopkins; so it doesn't 9 count as a degree, sadly. 10 Q. What about your work experience, let's 11 just say the last 20 years or so? 12 A. Oh, my goodness. 13 Q. You don't have to say everything. Just 14 an overview. 15 A. Well, I've run two companies, and 16 plus – and I sold them in 2000. And then in 17 about 2005, I started up my Strategic Vision 18 group. 19 Q. In 2005, starting Strategic Vision, is 20 that what you've been doing ever since? 21 A. Yes. 22 Q. Any other employment that you have or 23 businesses that you're running, other than 24 Strategic Vision? 25 A. Yes. I have another company that's</p>	<p style="text-align: right;">Page 12</p> <p>1 Dr. Waller? 2 A. I would say in the last year and a 3 half. 4 Q. And how did that come about? 5 A. We had an – I had an introduction by 6 Bill Gertz and Lianchao Han regarding this 7 particular client. I'm not sure, by the way, how 8 to refer to this client. We've referred to him 9 as Miles Guo, G-u-o. 10 Q. Eastern Profit is fine. 11 MR. SCHMIDT: Well, you know, you refer 12 to him however you think the client is. 13 A. He has about six names, so I'm not sure 14 what goes into the record. 15 Q. Whatever you know. 16 A. We refer to him as Miles Guo. But I 17 was referred to him by both Bill Gertz, the 18 Washington Times and the Free Beacon, and 19 Lianchao. And I – when they approached me, 20 that's when I decided Mike was one of the people 21 I really wanted to work with on this. 22 Q. But I wanted to ask you. Have you ever 23 worked with Dr. Waller on any investigatory 24 research before, as you said, you were introduced 25 to Mr. Guo?</p>
<p style="text-align: right;">Page 11</p> <p>1 called Regency Mayfair Worldwide, and that works 2 overseas on projects. 3 Q. What kind of projects? 4 A. Family office groups. 5 Q. What do you mean by that? What kind of 6 projects do you do for family office groups 7 through this Mayfair company? 8 A. Investment – investment advisory. 9 Q. Okay. So nothing to do with 10 investigatory research or things of that nature? 11 A. No. 12 Q. How do you know Michael Waller, or John 13 Michael Waller? 14 A. Well, Mike Waller is the way we refer 15 to him, or Dr. Waller. Gosh, I've known Mike for 16 many, many years. I would say, certainly, 17 certainly 20. And our paths have crossed many 18 times in Washington on both international affairs 19 and intelligence groups. 20 Q. When did Mr. Waller – well, I'll call 21 him Dr. Waller. 22 A. Yes, he is Dr. Waller. 23 Q. He didn't insist on it the last time, 24 but fair enough. When did you start – or when 25 did Strategic Vision start working with</p>	<p style="text-align: right;">Page 13</p> <p>1 A. No. No. 2 Q. Since you were introduced to Mr. Guo, 3 have you and Dr. Waller worked on any other 4 investigatory research together for another 5 client? You don't have to name them. 6 A. I can't name them. 7 Q. No, I'm saying whether you have or have 8 not provided – 9 A. Yes. 10 Q. – a service to another client? 11 A. Yes, but – yes. 12 Q. Okay. I didn't ask you to name the 13 client. 14 A. Don't worry. 15 Q. And how many other clients have you and 16 Dr. Waller worked on investigatory research for? 17 A. I can't answer that. 18 Q. So you're refusing to answer that 19 question? 20 MR. SCHMIDT: No, no, I don't think 21 that's what she's saying. 22 MR. GRENDI: Okay. 23 Q. How many? 24 A. Four. 25 MR. SCHMIDT: Approximately? Okay.</p>

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<p style="text-align: right;">Page 14</p> <p>1 THE WITNESS: Approximately, yeah.</p> <p>2 MR. GRENDI: I'm going to ask that you</p> <p>3 not try to interrupt.</p> <p>4 MR. SCHMIDT: I'm trying to keep you</p> <p>5 guys moving forward.</p> <p>6 MR. GRENDI: I appreciate that, but I'm</p> <p>7 not trying to –</p> <p>8 MR. SCHMIDT: I think you knew what she</p> <p>9 meant and kind of accused her of refusing to</p> <p>10 answer. I don't think that was appropriate,</p> <p>11 so that's when I had to step in, okay?</p> <p>12 MR. GRENDI: I didn't think that that's</p> <p>13 what I was doing. I was –</p> <p>14 MR. SCHMIDT: Okay. That's how it was</p> <p>15 coming across on the record, so I clarified</p> <p>16 it.</p> <p>17 MR. GRENDI: Okay. Fair enough.</p> <p>18 Q. So you and Dr. Waller have worked on</p> <p>19 approximately five different investigatory</p> <p>20 research projects with Strategic Vision?</p> <p>21 A. Yes.</p> <p>22 Q. And none of them preceded your</p> <p>23 introduction to Mr. Guo?</p> <p>24 A. No.</p> <p>25 Q. No, they did not precede –</p>	<p style="text-align: right;">Page 16</p> <p>1 how to answer it.</p> <p>2 Q. You don't understand the question?</p> <p>3 A. No, I don't understand the question.</p> <p>4 Q. Okay. What I'm saying is, when did you</p> <p>5 stop working with someone else in terms of</p> <p>6 providing investigatory research?</p> <p>7 A. I didn't say I had stopped.</p> <p>8 Q. So you work with, concurrently, other</p> <p>9 individuals who provide investigatory research</p> <p>10 for Strategic Vision?</p> <p>11 A. From time to time.</p> <p>12 Q. Okay. So you don't have an exclusive</p> <p>13 relationship with Dr. Waller in terms of</p> <p>14 investigatory research that he provides?</p> <p>15 A. No.</p> <p>16 Q. Okay. You said that you founded</p> <p>17 Strategic Vision in 2005?</p> <p>18 A. I think so. I'd have to look.</p> <p>19 Q. Okay. Was anyone else involved in the</p> <p>20 company at the time?</p> <p>21 A. No.</p> <p>22 Q. So it's always been your company?</p> <p>23 A. Yes.</p> <p>24 Q. And you've never had any other</p> <p>25 officers?</p>
<p style="text-align: right;">Page 15</p> <p>1 A. No.</p> <p>2 Q. – or –</p> <p>3 A. They did not.</p> <p>4 Q. Prior to working with Dr. Waller, did</p> <p>5 you work with someone else in terms of</p> <p>6 investigatory research for Strategic Vision?</p> <p>7 A. When?</p> <p>8 Q. Before you started working with</p> <p>9 Dr. Waller, so let's say prior to a year and a</p> <p>10 half ago.</p> <p>11 A. Yes.</p> <p>12 Q. And was it just one entity or several</p> <p>13 entities?</p> <p>14 A. I can't remember.</p> <p>15 Q. Without going into any detail. Was</p> <p>16 that a similar arrangement to your arrangement</p> <p>17 with Dr. Waller in terms of the provisioning of</p> <p>18 investigatory research?</p> <p>19 A. No.</p> <p>20 Q. How was it different?</p> <p>21 A. I can't remember.</p> <p>22 Q. When did you stop working with someone</p> <p>23 else on investigatory research prior to working</p> <p>24 with Dr. Waller?</p> <p>25 A. That's an odd question. I don't know</p>	<p style="text-align: right;">Page 17</p> <p>1 A. No.</p> <p>2 Q. Or directors?</p> <p>3 A. No.</p> <p>4 Q. Or unit holders?</p> <p>5 A. No.</p> <p>6 Q. Have there been any other principals of</p> <p>7 Strategic Vision, other than you?</p> <p>8 A. No.</p> <p>9 Q. So what's your role in Strategic</p> <p>10 Vision?</p> <p>11 A. I run certain advisory clients and work</p> <p>12 with them as clients, private clients.</p> <p>13 Q. Do you have a title, like CEO?</p> <p>14 A. Yes, I think it's CEO.</p> <p>15 Q. So what services does Strategic Vision</p> <p>16 provide to its clients?</p> <p>17 A. I've already answered that.</p> <p>18 Q. I don't think you have.</p> <p>19 A. I said advisory services.</p> <p>20 Q. What do you mean by advisory services?</p> <p>21 A. Advisory client services.</p> <p>22 Q. Does that include investigatory</p> <p>23 research?</p> <p>24 A. Yes, in some cases.</p> <p>25 Q. What does that investigatory research</p>

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<p style="text-align: right;">Page 18</p> <p>1 involve?</p> <p>2 A. Exactly as it says. Each client is</p> <p>3 different, isn't it?</p> <p>4 Q. Right. What I'm asking is, what does</p> <p>5 Strategic Vision's investigatory research</p> <p>6 services entail?</p> <p>7 A. Every client is different.</p> <p>8 Investigatory services is exactly that, depending</p> <p>9 upon how you want to define investigations.</p> <p>10 Q. How does Strategic Vision provide that</p> <p>11 service, what does it do?</p> <p>12 A. Investigate.</p> <p>13 Q. How?</p> <p>14 A. The usual ways.</p> <p>15 Q. What are the usual ways?</p> <p>16 A. I find it's a repetitive question.</p> <p>17 Q. I don't care if you find it a</p> <p>18 repetitive question. What I'm asking you to do</p> <p>19 is answer my question.</p> <p>20 I want to know how Strategic Vision</p> <p>21 performs investigations?</p> <p>22 A. We look everybody up on Facebook.</p> <p>23 Q. That's it?</p> <p>24 A. Sure. It's an idiotic question.</p> <p>25 MR. SCHMIDT: Don't comment. Just</p>	<p style="text-align: right;">Page 20</p> <p>1 A. No.</p> <p>2 Q. Who does?</p> <p>3 A. Whomever we bring on board to do the</p> <p>4 investigation.</p> <p>5 Q. So Strategic Vision hires independent</p> <p>6 contractors?</p> <p>7 A. Our own team of people that we have</p> <p>8 worked with off and on through the years, yes.</p> <p>9 Q. Do you or Strategic Vision provide any</p> <p>10 input or edits to any of the reports? I mean,</p> <p>11 what does Strategic do in terms of –</p> <p>12 A. We review the reports.</p> <p>13 Q. Do you ever edit them?</p> <p>14 A. I wouldn't say edit them, no.</p> <p>15 Q. How does Strategic Vision contribute to</p> <p>16 the end work product of an investigatory research</p> <p>17 report?</p> <p>18 A. Well, when we get them, we look at them</p> <p>19 and we read them, depending upon who the teams</p> <p>20 are, and discuss them, and then produce them.</p> <p>21 Sometimes they can be verbal, sometimes they can</p> <p>22 be on flash drives. It depends what the client</p> <p>23 needs.</p> <p>24 Q. Does Strategic Vision – well, let me</p> <p>25 ask you this. Strike that.</p>
<p style="text-align: right;">Page 19</p> <p>1 answer the question.</p> <p>2 Q. Excuse me, ma'am, I'm just trying to</p> <p>3 understand things. And I think – maybe you</p> <p>4 don't understand how a deposition works, but I'm</p> <p>5 just trying to understand basic information. You</p> <p>6 might think something is obvious or intuitive,</p> <p>7 but the record doesn't know that and we don't</p> <p>8 know that. So I please ask you to cooperate.</p> <p>9 A. Of course.</p> <p>10 Q. So other than looking people up on</p> <p>11 Facebook, how does Strategic Vision perform</p> <p>12 investigations?</p> <p>13 A. We do investigative background work on</p> <p>14 individuals that other clients are interested in</p> <p>15 pursuing information on.</p> <p>16 Q. So that background work, does that</p> <p>17 involve surveillance or electronic research; give</p> <p>18 me a little detail on what it means to</p> <p>19 investigate someone for background?</p> <p>20 A. Precisely. Just as you said.</p> <p>21 Q. Does Strategic Vision do that</p> <p>22 investigatory research itself?</p> <p>23 A. No.</p> <p>24 Q. So you never perform any research</p> <p>25 yourself?</p>	<p style="text-align: right;">Page 21</p> <p>1 Do you ever access a network of</p> <p>2 individuals that you're familiar with to get</p> <p>3 information for investigatory research?</p> <p>4 A. Sometimes.</p> <p>5 Q. And just, without naming any names,</p> <p>6 describe what that entails?</p> <p>7 A. Experience.</p> <p>8 Q. Right. Do you speak to individuals in</p> <p>9 the intelligence community?</p> <p>10 A. Yes.</p> <p>11 Q. Politicians?</p> <p>12 A. Sometimes.</p> <p>13 Q. People in the business community?</p> <p>14 A. Yes.</p> <p>15 Q. And then you take that information and</p> <p>16 perhaps include that in an investigatory research</p> <p>17 report, or how does that work?</p> <p>18 A. It depends on the client.</p> <p>19 Q. Give me an example of a client where</p> <p>20 you did access that network in order to</p> <p>21 contribute?</p> <p>22 A. I can't do that precisely.</p> <p>23 Q. Not with any specificity?</p> <p>24 A. Just as I said. We are very careful</p> <p>25 about the investigations that we do, they're</p>

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<p style="text-align: right;">Page 22</p> <p>1 private, and if they are what the client has 2 requested, that's what we do. 3 MR. SCHMIDT: French, maybe you can 4 give a response to these questions just kind 5 of a 30,000-foot level in general of what 6 you do would, different ideas you've done 7 over the years, that might be helpful. 8 THE WITNESS: Okay. 9 MR. SCHMIDT: Like types of things 10 you've done to research people, that sort of 11 thing. 12 Q. Please go ahead. 13 MR. SCHMIDT: Yeah, go ahead. 14 A. With what? 15 Q. What he just asked. 16 A. Go ahead, ask me the question again. 17 Q. Can you please give an overview of the 18 types of research investigations that Strategic 19 Vision does and how they do them? 20 A. We look at individual clients or groups 21 or companies or areas of interest on behalf of 22 our clients, whether it's international, whether 23 it's domestic. 24 Q. And how many investigations over the 25 years has Strategic Vision handled?</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. And Strategic Vision doesn't have any 2 employees? 3 A. No. 4 MR. GRENDI: Let's do Exhibit 1 here. 5 (Wallop Exhibit 1, Notice of 6 Deposition, marked for identification.) 7 Q. Ms. Wallop, do you recognize this 8 document? 9 A. I'm sure it's in the file. I don't 10 recognize it particularly. 11 Q. If you turn to the third page there, do 12 you see that, Attachment A? 13 A. Yes. 14 Q. And just generally speaking, do you 15 understand that this is a 30(b)(6) deposition 16 notice? 17 A. Yes. 18 Q. And did you review this document prior 19 to today? 20 A. Actually, I did not. 21 Q. Did you prepare for this deposition in 22 any way? 23 A. Of course. 24 Q. You met with your attorneys? And I'll 25 just caution you right away, don't tell me</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Oh, my goodness, I have no idea. 2 Q. Ballpark? 3 A. I have no idea. 4 Q. Fifty? 5 A. No. I would say probably, maybe 15, 6 20, something like that. 7 Q. That's since 2005? 8 A. It's probably more than that, but since 9 2005, yeah. 10 Q. Okay. And other than investigatory 11 services, what kind of services does Strategic 12 Vision provide? 13 A. As I've said earlier, we work with 14 clients on advisory services for family offices. 15 Q. That's part of Strategic Vision's 16 business? 17 A. I've already stated that. 18 Q. You mentioned another entity, that's 19 why I wasn't sure if you'd separated the two 20 entities or you – 21 A. No, you were very sure. You didn't – 22 that's not a fair statement. 23 MR. SCHMIDT: Just answer the question, 24 French. 25 THE WITNESS: Okay.</p>	<p style="text-align: right;">Page 25</p> <p>1 anything you said to your attorneys or your 2 attorneys said to you. 3 A. Well, exactly, of course I discussed it 4 with my attorneys. 5 Q. And did you meet and go over documents 6 in preparation for this deposition? 7 MR. SCHMIDT: You can say yes or no. 8 A. Yes. 9 Q. How long did you do that for? 10 A. Today, or ever, or? 11 Q. All in, sure, all together. 12 A. Sure. I have no idea what the answer 13 would be. 14 MR. SCHMIDT: Just do the best you can. 15 A. Okay. How about – for today's 16 deposition? 17 Q. Yes. 18 A. Okay. How about 3 hours, by telephone 19 or something. 20 MR. SCHMIDT: We had met in person 21 before, you should tell him that. 22 A. Oh, we had a coffee before, or I had a 23 coffee. 24 Q. And you prepared with your attorney 25 here, Mr. Schmidt?</p>

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<p style="text-align: right;">Page 26</p> <p>1 A. Yes.</p> <p>2 Q. Did you go over any documents?</p> <p>3 A. No.</p> <p>4 MR. SCHMIDT: I think you should tell</p> <p>5 him that, at the initial meeting we had, we</p> <p>6 went over the –</p> <p>7 A. Oh, well, of course –</p> <p>8 MR. SCHMIDT: – the documents. That</p> <p>9 counts as well. You should –</p> <p>10 THE WITNESS: I thought he was talking</p> <p>11 about the 30 minutes that we met for coffee</p> <p>12 before we walked across the street. So,</p> <p>13 okay.</p> <p>14 MR. SCHMIDT: Fill out the record.</p> <p>15 THE WITNESS: So, all right. Yeah, no,</p> <p>16 obviously.</p> <p>17 Q. Let's clean that up, just so I</p> <p>18 understand. Did you go over documents in</p> <p>19 preparation for this deposition?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Let's go to the next document.</p> <p>22 Just generally speaking, you understand that I'll</p> <p>23 be asking questions addressed to Strategic</p> <p>24 Vision. In response to those, you'll be</p> <p>25 answering on behalf of Strategic Vision; you</p>	<p style="text-align: right;">Page 28</p> <p>1 Dr. Waller – or, I'm sorry, Lianchao Han?</p> <p>2 A. It's public.</p> <p>3 Q. I understand that.</p> <p>4 A. I have no idea whether they saw it or</p> <p>5 not.</p> <p>6 Q. I'm asking whether you personally gave</p> <p>7 it to them?</p> <p>8 A. I have no idea.</p> <p>9 MR. SCHMIDT: Do you remember giving it</p> <p>10 to them?</p> <p>11 THE WITNESS: No.</p> <p>12 Q. Okay. And it says here, "over a</p> <p>13 40-year period, the principal has developed and</p> <p>14 maintained connections with many U.S.</p> <p>15 administrations, Congress, DOD, DOE and other</p> <p>16 agencies." Do you see that?</p> <p>17 A. Correct.</p> <p>18 Q. And that's your network of contacts</p> <p>19 being referred to there?</p> <p>20 A. Correct.</p> <p>21 Q. And if you look a little further down</p> <p>22 the page, it mentions strategic research, do you</p> <p>23 see that?</p> <p>24 A. Yes.</p> <p>25 Q. Is that investigatory research; I mean,</p>
<p style="text-align: right;">Page 27</p> <p>1 understand that, right?</p> <p>2 A. Correct.</p> <p>3 MR. GRENDI: This is Exhibit 2.</p> <p>4 (Wallop Exhibit 2, Document Bates</p> <p>5 stamped Eastern 000017, marked for</p> <p>6 identification.)</p> <p>7 Q. Ms. Wallop, I've handed you a document</p> <p>8 that has the Bates number Eastern 17 in the</p> <p>9 bottom right-hand corner of the first page, do</p> <p>10 you see that?</p> <p>11 A. Correct.</p> <p>12 Q. Just so you – for the clarity of the</p> <p>13 record and for your own edification, sometimes</p> <p>14 I'll be referring to documents by their Bates</p> <p>15 number, just to be clear, and I just want to make</p> <p>16 sure you know what a Bates number was.</p> <p>17 A. Thank you.</p> <p>18 Q. Do you recognize this document?</p> <p>19 A. It looks like a LinkedIn document or</p> <p>20 print-off.</p> <p>21 Q. So did you create the content in this</p> <p>22 document?</p> <p>23 A. Yes.</p> <p>24 Q. And did you ever give this information</p> <p>25 to Mr. Guo or Yvette Wang or Michael – or</p>	<p style="text-align: right;">Page 29</p> <p>1 what does that mean?</p> <p>2 A. It can be.</p> <p>3 Q. What about competitive intelligence,</p> <p>4 that's the last item there?</p> <p>5 A. Yes. What about it?</p> <p>6 Q. Is that inclusive of investigatory</p> <p>7 private research or investigations?</p> <p>8 A. In some cases, yes.</p> <p>9 Q. Is private investigations a specialty</p> <p>10 of Strategic Vision or does it really provide a</p> <p>11 broader suite of services?</p> <p>12 A. Broader suite, but it's inclusive of</p> <p>13 that, if required.</p> <p>14 Q. Would you consider investigatory</p> <p>15 research a core service of Strategic Vision?</p> <p>16 MR. SCHMIDT: Objection. Go ahead.</p> <p>17 A. No.</p> <p>18 Q. So it's kind of like a side service</p> <p>19 that Strategic Vision provides?</p> <p>20 MR. SCHMIDT: Same objection, but go</p> <p>21 ahead.</p> <p>22 A. It depends on the client's request.</p> <p>23 Q. So sometimes it's the general focus of</p> <p>24 Strategic Vision's service to a client and other</p> <p>25 times it's not even part of the service?</p>

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<p style="text-align: right;">Page 30</p> <p>1 A. Correct.</p> <p>2 Q. Does Strategic Vision provide lobbying</p> <p>3 services?</p> <p>4 A. Again, that depends on the client. We</p> <p>5 don't do it directly, but we will work with</p> <p>6 people that are lobbyists.</p> <p>7 Q. So sometimes –</p> <p>8 A. Sometimes.</p> <p>9 Q. – Strategic Vision provides lobbying</p> <p>10 services?</p> <p>11 A. Sometimes, yes.</p> <p>12 MR. GRENDI: This is 3.</p> <p>13 (Wallop Exhibit 3, Document Bates</p> <p>14 stamped SVUS000077, marked for</p> <p>15 identification.)</p> <p>16 Q. Ms. Wallop, do you recognize this</p> <p>17 document?</p> <p>18 A. I do.</p> <p>19 Q. What is it?</p> <p>20 A. It is a preliminary sort of vision for</p> <p>21 Miles Guo, for our first meeting, I believe, with</p> <p>22 him, that both Mike Waller, Dr. Waller and I</p> <p>23 worked on.</p> <p>24 Q. So the handwriting on the top right</p> <p>25 corner, is that your handwriting?</p>	<p style="text-align: right;">Page 32</p> <p>1 A. I think sometime in late October or</p> <p>2 early November.</p> <p>3 Q. Of what year?</p> <p>4 A. 2017.</p> <p>5 Q. Do you recall if it was Mr. Gertz or</p> <p>6 Mr. Han that called you, or how did that</p> <p>7 interaction occur?</p> <p>8 A. That's a good question. I think it was</p> <p>9 Bill Gertz. I think he may have called me.</p> <p>10 Q. And what did he tell you?</p> <p>11 A. He knew that I had been working in the</p> <p>12 past for Taiwan and had been very active in</p> <p>13 pro-democracy work, and I think he said at that</p> <p>14 point he would like to have lunch with me, and,</p> <p>15 possibly, Lianchao was at that first lunch. I</p> <p>16 think that was how it went.</p> <p>17 Q. Those were the three people who were</p> <p>18 present at that lunch?</p> <p>19 A. Yes. The three of us, yes.</p> <p>20 Q. And what was discussed there?</p> <p>21 A. He discussed Mr. Guo, and that he had</p> <p>22 met with him, I guess, a number of times, I don't</p> <p>23 know over what period of time, but that he</p> <p>24 believed that he was looking for a group that</p> <p>25 could help change his – Mr. Guo – Miles Guo's</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Yes.</p> <p>2 Q. And when did you make that note, if you</p> <p>3 recall?</p> <p>4 A. I'd have to – to look on my paper</p> <p>5 calendar. I don't remember.</p> <p>6 Q. You have a paper calendar that you</p> <p>7 keep?</p> <p>8 A. No. I'd have to look – I'd have to</p> <p>9 look. I remember it was sort of – there was –</p> <p>10 there was one meeting in early December, and I</p> <p>11 don't have that with me.</p> <p>12 Q. Ms. Wallop, do you keep a calendar?</p> <p>13 A. No, I don't keep anything on – I keep</p> <p>14 notes, sticky notes, so.</p> <p>15 Q. You don't keep like a Google</p> <p>16 calendar –</p> <p>17 A. No.</p> <p>18 Q. – or electronic calendar?</p> <p>19 A. God, no.</p> <p>20 Q. You keep paper Post-it notes to track</p> <p>21 your meetings and schedule?</p> <p>22 A. Yes.</p> <p>23 Q. How were you introduced to Mr. Guo?</p> <p>24 A. Through Bill Gertz and Lianchao Han.</p> <p>25 Q. And when did that come about?</p>	<p style="text-align: right;">Page 33</p> <p>1 image in America. He explained a little bit</p> <p>2 about Miles Guo's issues, and we discussed at the</p> <p>3 time how perhaps there might be a way of helping</p> <p>4 him stay in the United States.</p> <p>5 Q. What were the issues that you just</p> <p>6 mentioned?</p> <p>7 A. Pro-communist people that were</p> <p>8 apparently after him. There were many lawsuits</p> <p>9 apparently that had been filed against Mr. Guo.</p> <p>10 We didn't know anything about Mr. Guo, per se,</p> <p>11 other than some of the media reports.</p> <p>12 So Lianchao suggested that we meet with</p> <p>13 him, and I said, well, I will – I'll think about</p> <p>14 it and get back to you.</p> <p>15 Q. And so, you said before that you knew</p> <p>16 Mr. Gertz from years in politics or what's</p> <p>17 your –</p> <p>18 A. He used to be, he still is, he's still</p> <p>19 at the Washington Times, and he writes for the</p> <p>20 Washington Times, and he's now with the</p> <p>21 Washington – Washington Times.</p> <p>22 MR. SCHMIDT: Times or Post?</p> <p>23 THE WITNESS: Washington Times. Good</p> <p>24 God, not the Washington Times.</p> <p>25 Q. It's a different – it's a different</p>

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<p style="text-align: right;">Page 34</p> <p>1 outfit.</p> <p>2 A. Yeah. And the – it's certainly</p> <p>3 conservative, it was run under the time when</p> <p>4 Amaud de Borchgrave was the editor, along with</p> <p>5 several other close friends, and he's now at the</p> <p>6 Washington Free Beacon, I think, mostly.</p> <p>7 Q. Is that another right of center</p> <p>8 publication?</p> <p>9 A. Um-hum. I think I would call it a</p> <p>10 center and conservative. I wouldn't call it</p> <p>11 right of center.</p> <p>12 Q. I was –</p> <p>13 A. I mean, really?</p> <p>14 Q. – asking for your – I was asking for</p> <p>15 your understanding of it.</p> <p>16 A. Well, you've got my understanding of</p> <p>17 it.</p> <p>18 Q. Thank you.</p> <p>19 A. You're welcome.</p> <p>20 Q. And how do you know Lianchao Han?</p> <p>21 A. Lianchao and I have crossed paths in</p> <p>22 Washington off and on over the years, maybe</p> <p>23 because of some of the Taiwan activities in</p> <p>24 Washington. But I've always sort of known him</p> <p>25 and liked him. I never worked with him. But</p>	<p style="text-align: right;">Page 36</p> <p>1 about?</p> <p>2 A. Well, I talked – I mentioned to Bill,</p> <p>3 I said, one of the people that I like a lot and</p> <p>4 have worked with on a couple of things, but not</p> <p>5 monetary, but just ideological, was Dr. Waller,</p> <p>6 and I'd like to bring Dr. Waller in on this. And</p> <p>7 he said, wow, that would be phenomenal. So, here</p> <p>8 we are.</p> <p>9 Q. And did you speak to Mr. Guo before</p> <p>10 putting this document together or was this just</p> <p>11 based on your conversations with Mr. Han and</p> <p>12 Mr. Gertz?</p> <p>13 A. I know that we had a preliminary one,</p> <p>14 then we met with Mr. Guo, we did something</p> <p>15 similar to this and gave it to him, I believe,</p> <p>16 and – and then we had, obviously, several other</p> <p>17 meetings after that with Mr. Guo.</p> <p>18 Q. So, just speaking about this first</p> <p>19 meeting. Where did it occur?</p> <p>20 A. With Mr. Guo?</p> <p>21 Q. Yes.</p> <p>22 A. Okay. In his apartment at the</p> <p>23 Sherry-Netherland, his penthouse.</p> <p>24 Q. And when was that?</p> <p>25 A. I don't have a date on here, so I can't</p>
<p style="text-align: right;">Page 35</p> <p>1 he's an excellent individual.</p> <p>2 Q. Did Strategic Vision pay any referral</p> <p>3 fees or any other consideration to Mr. Han for</p> <p>4 introducing Mr. Guo to you?</p> <p>5 A. Good Lord, no.</p> <p>6 Q. What about Mr. Gertz?</p> <p>7 A. Never.</p> <p>8 Q. Okay. And going back to this first</p> <p>9 meeting document. Did you present this document</p> <p>10 to Mr. Guo or was this just you and Mr. Waller's</p> <p>11 notes?</p> <p>12 A. I know that we presented one that was</p> <p>13 very similar to this, and I think a bit more –</p> <p>14 it might have been a bit more extensive, but it</p> <p>15 encapsulated. We were probably trying to keep it</p> <p>16 short and concise, but we did – we did work on</p> <p>17 this vision based upon what both Mr. Gertz and</p> <p>18 Lianchao had told us about him and what his sort</p> <p>19 of ambitions were for remaining in the United</p> <p>20 States.</p> <p>21 Q. So did you and Dr. Waller create this</p> <p>22 document after your meeting with Mr. Han and</p> <p>23 Mr. Gertz?</p> <p>24 A. Yes.</p> <p>25 Q. And how did that collaboration come</p>	<p style="text-align: right;">Page 37</p> <p>1 tell you.</p> <p>2 Q. From your memory.</p> <p>3 A. Well, it would have been in December at</p> <p>4 some point.</p> <p>5 Q. December 2017?</p> <p>6 A. Yes, sorry.</p> <p>7 Q. That's okay. What occurred at that</p> <p>8 meeting? What did you present and what did</p> <p>9 Mr. Guo say?</p> <p>10 A. I believe Lianchao was also there – I</p> <p>11 know he was there, and Dr. Waller and I were</p> <p>12 there, and we discussed his – that is, Miles</p> <p>13 Guo's life, his intentions, his questions about</p> <p>14 investigative work; all of that was part of the</p> <p>15 conversation.</p> <p>16 He wanted to be – he wanted to have a</p> <p>17 presence in Washington, he wanted to buy real</p> <p>18 estate in Washington, he wanted to buy a very</p> <p>19 large bank building in Washington right across</p> <p>20 from the White House, he wanted to buy a huge</p> <p>21 house in Washington. All of these things were</p> <p>22 part of his sort of image building.</p> <p>23 Q. And those were his ideas?</p> <p>24 A. Yes.</p> <p>25 Q. But you hadn't met with Mr. Guo before</p>

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<p style="text-align: right;">Page 38</p> <p>1 this meeting, right?</p> <p>2 A. No. But the meeting went on for hours</p> <p>3 and hours and hours. You're asking what was the</p> <p>4 content of the meeting.</p> <p>5 Q. Yes.</p> <p>6 A. Yes, that's what I'm saying.</p> <p>7 Q. So was this document written during the</p> <p>8 meeting or before?</p> <p>9 A. I think this one may have been – may</p> <p>10 have been before, but – yes, I think it was</p> <p>11 before, because it doesn't mention the real</p> <p>12 estate and so forth that he got into during the</p> <p>13 meeting. So this might have been sort of like</p> <p>14 a – it is sort of a vision paper, based on a</p> <p>15 conversation with Mr. – with Bill Gertz and with</p> <p>16 Lianchao Han.</p> <p>17 Q. What do you recall saying about</p> <p>18 Strategic Vision's capabilities and background?</p> <p>19 Actually, let's just start with capabilities.</p> <p>20 Do you recall presenting about what</p> <p>21 Strategic Vision could do for Mr. Guo?</p> <p>22 A. We were talking ideologically mostly</p> <p>23 about what could be done to help present his</p> <p>24 views on communist China, on mainland China. And</p> <p>25 so we didn't get into specifics at the very</p>	<p style="text-align: right;">Page 40</p> <p>1 been.</p> <p>2 Q. What do you remember about that?</p> <p>3 A. I remember that we discussed that Miles</p> <p>4 Guo said that he had a number of people that he</p> <p>5 wanted to know more about that were in mainland</p> <p>6 China, but we didn't have any specifics at that</p> <p>7 time what he was talking about.</p> <p>8 Q. Did Strategic Vision mention that it</p> <p>9 could provide that information or that it had</p> <p>10 that capability?</p> <p>11 A. I don't recall. It could have.</p> <p>12 Q. Turning to the last page there, SV79.</p> <p>13 It says, "Mr. G should maintain his statesmanlike</p> <p>14 status by not engaging in everyday defense or</p> <p>15 counterattack, and should leave it up to his own</p> <p>16 surrogates."</p> <p>17 Do you see that?</p> <p>18 A. Where is that?</p> <p>19 Q. It's the first sentence of the last</p> <p>20 paragraph.</p> <p>21 A. Oh, the regime, yeah. Okay. "Those</p> <p>22 surrogates will be in journalism, academia,</p> <p>23 business, policy." Yes, yes. Okay.</p> <p>24 Q. Do you remember talking about that</p> <p>25 subject at this meeting?</p>
<p style="text-align: right;">Page 39</p> <p>1 beginning. We just started sort of having an</p> <p>2 initial conversation about how – how we felt he</p> <p>3 could be represented in Washington and how we</p> <p>4 could show his positive side.</p> <p>5 Q. And did you explain what Strategic</p> <p>6 Vision does or how Strategic Vision could help</p> <p>7 with that?</p> <p>8 A. Probably.</p> <p>9 Q. Do you recall what, if anything, you</p> <p>10 said about that?</p> <p>11 A. Not precisely, no. Generalities. This</p> <p>12 was someone we just met, and it is the custom in</p> <p>13 Asia not to dive into a lot of details unless</p> <p>14 you're asked.</p> <p>15 Q. So did Mr. Lianchao Han or Mr. Guo ask</p> <p>16 about Strategic Vision's capabilities?</p> <p>17 A. Eventually.</p> <p>18 Q. But not at this meeting?</p> <p>19 A. Not entire – I don't recall.</p> <p>20 Q. Okay.</p> <p>21 A. But they could have, but I don't</p> <p>22 precisely recall.</p> <p>23 Q. Was investigatory research discussed in</p> <p>24 any detail at this first meeting?</p> <p>25 A. It could have been. It could have</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Probably.</p> <p>2 Q. And what do you remember?</p> <p>3 A. I don't remember precisely. It's over</p> <p>4 a year ago.</p> <p>5 Q. And you don't remember what Mr. Guo</p> <p>6 said about that, or anybody else?</p> <p>7 A. It was a general, initial conversation</p> <p>8 with somebody that we did not know, and we were</p> <p>9 asked to produce something that we felt could be</p> <p>10 a good vision for him to consider, perhaps, yeah.</p> <p>11 (Wallop Exhibit 4, Document entitled</p> <p>12 "Three-Year Timeline" Bates stamped</p> <p>13 SVUS000080, marked for identification.)</p> <p>14 Q. Do you recognize what's been marked as</p> <p>15 Waller 4?</p> <p>16 A. Yes.</p> <p>17 Q. And what is this document?</p> <p>18 A. Wallop.</p> <p>19 Q. Oh, sorry, Wallop. I apologize. The</p> <p>20 W. Wallop 4.</p> <p>21 A. Yes.</p> <p>22 Q. Did you create this document?</p> <p>23 A. Yes. Mike and I did.</p> <p>24 Q. When was that?</p> <p>25 A. That was at the second meeting with</p>

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<p style="text-align: right;">Page 42</p> <p>1 Miles Guo.</p> <p>2 Q. So you remember literally typing and</p> <p>3 creating this document during the meeting?</p> <p>4 A. No. Prior to the meeting.</p> <p>5 Q. Okay. And when was this second</p> <p>6 meeting?</p> <p>7 A. Again, I'd have to ask Mike. I think</p> <p>8 it was – I know it was in December of 2017.</p> <p>9 Q. And who was present?</p> <p>10 A. Dr. Waller, Mike Waller, myself,</p> <p>11 Lianchao, and, obviously, Miles Guo.</p> <p>12 Q. What was Lianchao's role in the</p> <p>13 meeting; was he translating?</p> <p>14 A. Yes, mostly. And explaining, walking</p> <p>15 through some of the explanations, not only the</p> <p>16 translation, but, again, we were having a</p> <p>17 generalized conversation.</p> <p>18 Q. And just for the clarity of the record.</p> <p>19 Mr. Han was translating for Mr. Guo?</p> <p>20 A. Yes. Both ways.</p> <p>21 Q. Of course.</p> <p>22 A. Mr. Guo speaks very good English, so he</p> <p>23 doesn't really need an interpreter, but it's</p> <p>24 better to have one.</p> <p>25 Q. Did Mr. Han actually read this whole</p>	<p style="text-align: right;">Page 44</p> <p>1 A. He liked it very much.</p> <p>2 Q. Does that include all of the items in</p> <p>3 this timeline or was he more receptive to some</p> <p>4 services than others?</p> <p>5 A. It was interesting. He was very keen</p> <p>6 on having a – a big, a huge, large presence in</p> <p>7 the way of a residence, and then also purchasing</p> <p>8 the American Security and Trust building across</p> <p>9 from the Treasury Department in Washington as an</p> <p>10 office building for him. He liked the idea of</p> <p>11 the Washington-based educational and cultural</p> <p>12 foundation, which we thought might be a good way</p> <p>13 of exposing him to or introducing him to</p> <p>14 Washington and the Hill, and working on a more</p> <p>15 positive anti-communist role.</p> <p>16 Q. And in terms of this real estate</p> <p>17 portion of it, acquiring what, a residence?</p> <p>18 A. Yes.</p> <p>19 Q. And also an office building, I guess,</p> <p>20 for a foundation?</p> <p>21 A. Yes. I just said that.</p> <p>22 Q. Yes. I understand. And so, is that a</p> <p>23 service that Strategic Vision typically provides</p> <p>24 for clients?</p> <p>25 A. Yes, sometimes.</p>
<p style="text-align: right;">Page 43</p> <p>1 document to Mr. Guo and translate it for him; was</p> <p>2 that part of the meeting?</p> <p>3 A. Yes. I think we walked through each</p> <p>4 one of these paragraphs, yes.</p> <p>5 Q. And going back to the prior document,</p> <p>6 Exhibit 3. Was the same process employed where</p> <p>7 Mr. Han, to your understanding, was translating</p> <p>8 the document for Mr. Guo?</p> <p>9 A. To my understanding, yes.</p> <p>10 Q. But, obviously, you don't speak</p> <p>11 Mandarin, do you?</p> <p>12 A. A little bit. Not as much as I'd like.</p> <p>13 Q. Fair enough. But you're not fluent?</p> <p>14 A. No.</p> <p>15 Q. Okay. And so, to the extent you</p> <p>16 recall, what occurred at this second meeting?</p> <p>17 A. This was a broader timeline based on</p> <p>18 the first meeting and the first vision paper that</p> <p>19 we had in our discussion, and this gave sort of a</p> <p>20 menu, so to speak, a la carte, or menu of ideas</p> <p>21 as to how we could help Miles Guo, at his</p> <p>22 request, to set up sort of a strategic plan for</p> <p>23 him.</p> <p>24 Q. So what was his response to the</p> <p>25 presentation that you made?</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. So Strategic Vision will help people</p> <p>2 locate properties and acquire them?</p> <p>3 A. Correct.</p> <p>4 Q. Is that in the D.C. area or nationwide;</p> <p>5 how does that work?</p> <p>6 A. Yes, both. D.C. area, nationwide,</p> <p>7 globally, whatever.</p> <p>8 Q. And how was that, let's just call it</p> <p>9 real estate project, followed up on subsequently?</p> <p>10 A. Well, actually, Lianchao – I picked up</p> <p>11 Lianchao and Yvette at a hotel downtown off M</p> <p>12 Street, because she wanted to see all of the</p> <p>13 properties that we had in mind. I think it must</p> <p>14 have been obviously – honestly I can't remember.</p> <p>15 I think it was – I think it was after this</p> <p>16 second meeting, that she came to Washington, and</p> <p>17 Lianchao lives in Washington, so we picked him</p> <p>18 up, and I had a brochure, a set of brochures of</p> <p>19 homes and the office building that we drove</p> <p>20 around, because there are a lot of cameras in</p> <p>21 Washington.</p> <p>22 We put her in the back seat with</p> <p>23 Lianchao. I have a Jeep, so those windows happen</p> <p>24 to have a, whatever it is, sun – more blacked</p> <p>25 out windows than the front two seats.</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q. Tinted windows?</p> <p>2 A. Tinted, yes. So we drove them around,</p> <p>3 and I pointed out the homes. I never made any</p> <p>4 appointments to see the homes, because the last</p> <p>5 thing we wanted to do was sort of bring Yvette or</p> <p>6 anybody else in to see the homes. We had the</p> <p>7 brochures that had all of the interiors in the</p> <p>8 homes, photographs, so she could easily see it.</p> <p>9 We went around Kalorama, we went around</p> <p>10 Georgetown, we went into what they call Spring</p> <p>11 Valley.</p> <p>12 Q. And, Ms. Wang, was this the first time</p> <p>13 you met her?</p> <p>14 A. No. She was also in one of those</p> <p>15 meetings, probably in the first meeting we had,</p> <p>16 this one, sorry; whenever the first meeting was</p> <p>17 with Guo, she was present.</p> <p>18 Q. So, I'm sorry, I just want to clarify</p> <p>19 the record then. Who was present at the first</p> <p>20 meeting that you had with Mr. Guo?</p> <p>21 A. I think Yvette, Lianchao, Dr. Waller,</p> <p>22 myself and Miles Guo.</p> <p>23 Q. Okay. And when was this –</p> <p>24 A. Walkabout?</p> <p>25 Q. Yeah. Little soldiering through the</p>	<p style="text-align: right;">Page 48</p> <p>1 \$50 million homes. You have to give a full</p> <p>2 background. I can say – I can go in and look at</p> <p>3 it, but when I bring somebody like Yvette, and</p> <p>4 then I'd have to also identify Lianchao; it was</p> <p>5 better just to drive around, take a look, decide</p> <p>6 what sort of looked like something that both</p> <p>7 Lianchao and Yvette thought might fit his</p> <p>8 persona, and then go back and go and look at the</p> <p>9 homes, if that's what he wanted to do.</p> <p>10 Q. Did anything come of that –</p> <p>11 A. No.</p> <p>12 Q. – process?</p> <p>13 A. No. And we did make a big foray into</p> <p>14 trying to get the Riggs Bank building, which is</p> <p>15 something that he wanted – I'm sorry, excuse me,</p> <p>16 the American Security and Trust building, which</p> <p>17 is what he wanted, opposite the Treasury</p> <p>18 Department.</p> <p>19 Q. And what was that effort, if you could</p> <p>20 just generally describe that?</p> <p>21 A. Well, I called three or four people</p> <p>22 that I think were private owners somehow through</p> <p>23 a trust, and they told me repeatedly it wasn't</p> <p>24 for sale. And then I finally found out that of</p> <p>25 course it was for sale at the right price.</p>
<p style="text-align: right;">Page 47</p> <p>1 D.C. metro area?</p> <p>2 A. It was sometime in December. It must</p> <p>3 have been, you know, somewhere from the –</p> <p>4 somewhere between the 10th and the 20th of</p> <p>5 December of 2017.</p> <p>6 Q. And what did you understand that</p> <p>7 Ms. Wang and Mr. Guo were doing with that trip?</p> <p>8 What was their purpose in being there?</p> <p>9 A. She wanted to see the brochures that we</p> <p>10 had, and I think I – I can't remember, I think I</p> <p>11 showed the Evermay property to Miles Guo during</p> <p>12 that second meeting. I happen to have a copy of</p> <p>13 it with me. I had to ask to get copies of the</p> <p>14 other homes from Washington Fine Properties so</p> <p>15 that I knew what he wanted as far as large</p> <p>16 estates or large homes, and he wanted to have a</p> <p>17 presence, he wanted to be close enough to Capitol</p> <p>18 Hill.</p> <p>19 Q. And just going back. You didn't show</p> <p>20 them the interiors of the property because you</p> <p>21 were concerned about surveillance or –</p> <p>22 A. Well, the way it works is, if it's in</p> <p>23 Washington particularly, if you take an</p> <p>24 individual in, you have to identify the</p> <p>25 individual into multi-million-dollar, 10, 20, 30,</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. Sure.</p> <p>2 A. And we hadn't even gotten down that far</p> <p>3 down the lane. So I don't know what the number</p> <p>4 would have been, but it was substantial, hundreds</p> <p>5 of millions.</p> <p>6 Q. And you were – so were those the only,</p> <p>7 we'll call them sellers, you were in contact with</p> <p>8 in connection with this real estate project?</p> <p>9 A. Well, on the office building, yes.</p> <p>10 Q. What about with residential properties?</p> <p>11 A. Well, with Evermay, I was in touch –</p> <p>12 the previous owner of Evermay, sadly, who just</p> <p>13 died in November this year, the previous owner</p> <p>14 had been a childhood friend since I was 12, and</p> <p>15 they had recently sold, probably five years prior</p> <p>16 to this, they had recently sold Evermay to a</p> <p>17 Japanese couple in the pharmaceutical business.</p> <p>18 Fast forward, Japanese couple was</p> <p>19 getting divorced. Fast forward as well, the</p> <p>20 previous owners of Evermay had a first right of</p> <p>21 refusal; should they decide to buy the property</p> <p>22 back from the Japanese couple, they could, in</p> <p>23 their contract.</p> <p>24 So I went to – his name was Harry</p> <p>25 Belin. I went to Harry Belin and talked to him</p>

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<p style="text-align: right;">Page 50</p> <p>1 about Evermay for Miles Guo, because it would 2 have been a perfect, perfect house for Miles. He 3 could have incorporated his 501(c)(3) in that 4 house, because it was used as a 501(c)(3) 5 foundation by both Harry Belin and the Japanese 6 pharmaceutical couple. 7 Since there was no movement, we didn't 8 go any further on it, because Miles obviously 9 didn't – I don't know. I don't know what 10 happened. 11 Q. You kind of anticipated my next 12 question. When did this kind of process stop or 13 end? 14 A. Miles was mostly really, really anxious 15 to move on the investigative side of the famous 16 file that you're aware of. 17 Q. Sure. 18 A. So, on the individuals. I have no 19 idea – he changes his mind all the time, so I 20 have no idea what his change of heart was on 21 that. 22 Q. When did – if you recall, when did the 23 conversation or negotiations pivot to this 24 investigatory research area? 25 A. Probably during the second meeting.</p>	<p style="text-align: right;">Page 52</p> <p>1 A. That was in that December 2017 time, 2 yes. 3 Q. What was – was it research that was 4 offered or did Mr. Guo ask for that? 5 A. I believe he gave us a name, and I 6 believe that we then had an exploratory peek into 7 what we could find initially. 8 Q. So what was that exploratory research? 9 What was done by Strategic Vision? 10 A. It was a – it was done by our team, or 11 the initial team, before we even had a team, that 12 was contracted by us. This was sort of a 13 freebie, to take a peek into this individual's 14 name, whatever, background. And he gave us the 15 name. I believe it was the number 1 name on the 16 folder that you have. 17 Q. Is that Anita Suen? 18 A. Yeah. 19 Q. And that name was given to someone who 20 has been described by Strategic Vision as the 21 leader of Team 1? Was that the – 22 A. What? I'm sorry, I don't understand 23 that question at all. 24 Q. Maybe we'll get to it, we can define 25 it. Let's just put it this way. Who was that</p>
<p style="text-align: right;">Page 51</p> <p>1 Mike has got a much better memory about these 2 things. 3 Q. Do you recall how that occurred, was it 4 that Strategic Vision presented its investigatory 5 capabilities and Mr. Guo got excited or did he 6 ask about it; what occurred? 7 A. We were – again, we were speaking 8 about it in generalities. It's not something you 9 boast about. It's not something you discuss in a 10 way that is – well, it's just not something you 11 boast about. You can discuss it, you can discuss 12 the activities that can happen, and on a 13 hypothetical basis. 14 Q. Did there come a time when Strategic 15 Vision offered to provide the sample 16 investigatory research on this – 17 A. Yes. 18 Q. – vein of services? 19 A. Yes, I believe there was. 20 Q. When was that? 21 A. I don't have the date. 22 Q. Just generally, was it in this 23 December – 24 A. It was in that December – 25 Q. – 2017 time frame?</p>	<p style="text-align: right;">Page 53</p> <p>1 information regarding Anita Suen given to do 2 the research? 3 A. Mike. 4 Q. Oh, okay. Mike Waller? 5 A. Yes. 6 Q. Do you know what Mr. Waller did with 7 that information? 8 A. Not precisely, no. 9 Q. What understanding at all did you have 10 of what Mr. Waller would do with that 11 information? 12 A. He was going to explore some of his 13 channels. 14 Q. Do you know Dr. Waller's what you 15 describe as channels or – 16 A. No, not all of them, no. 17 Q. So you don't know all of the – 18 A. We have channels. We both have 19 channels. I have channels, he has channels. 20 Q. And do you deliberately keep your 21 channels confidential or secret from one another 22 for – 23 A. Yes. 24 Q. And why is that? 25 A. For security.</p>

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<p style="text-align: right;">Page 54</p> <p>1 Q. So this freebie research report, was 2 that research completed, or conducted? 3 A. It was conducted. It wasn't completed 4 by any stretch. 5 Q. Right. And so what was -- was anything 6 presented back to Mr. Guo or Han or Ms. Wang? 7 A. Yes. I believe, yes, we did show -- 8 again, Mr. Han, Mr. Guo, Miles Guo, and Mike and 9 myself were privy to whatever Mike had found. 10 Q. So there was like a third meeting with 11 respect to this -- 12 A. Yes, somewhere. 13 Q. -- pre-report? 14 A. Yes. In December of 2017. 15 Q. Okay. And where did that take place, 16 was it in New York? 17 A. Yes. 18 Q. What did Strategic Vision present as 19 this free report or free information? 20 A. They -- I believe they had a -- Mike 21 had a screenshot of a couple of things that he 22 showed Miles Guo. 23 Q. Was it information about accessing a 24 CITIC Bank account? 25 A. I believe so, yes. It wasn't</p>	<p style="text-align: right;">Page 56</p> <p>1 It wasn't very in depth. I think it might have 2 had some numbers on it, it might have had some 3 account numbers on it or something like that. 4 But it was basically just to show how 5 some things could be retrieved. We had to be 6 extremely careful. These things were only 7 retrieved outside of The United States, and if 8 they were -- they were never retrieved inside The 9 United States. 10 Q. And why was that? 11 A. Because it's not really a terribly good 12 thing to do. 13 Q. Is that because it's illegal or -- 14 A. It's probably illegal, yes. So we 15 would never do anything illegal. 16 MR. SCHMIDT: In The United States. 17 THE WITNESS: In The United States. Or 18 elsewhere, actually. 19 Q. And did this presentation involve 20 showing that there was money in the bank account 21 or anything of that nature? 22 A. I don't remember. I saw it so quickly, 23 I -- because it was really Guo and either Yvette 24 or Lianchao looking at it. I wasn't looking at 25 it.</p>
<p style="text-align: right;">Page 55</p> <p>1 accessing. Please understand, there's a huge 2 difference. 3 Q. Oh, please. I want you to explain. 4 What was presented? That's what I want to 5 understand. 6 A. Yes. There's a huge difference between 7 accessing. It was not accessing. It was what 8 they call peeking. It was not invading into the 9 server. 10 Q. Okay. 11 A. Okay. 12 Q. What does peeking mean? I just want to 13 understand that clearly. 14 A. To look over the wall. 15 THE WITNESS: As I see, Yvette has 16 walked into the room. 17 MR. SCHMIDT: The court reporter will 18 take down the appearance. That's fine. 19 (Ms. Yvette Wang has joined the 20 deposition.) 21 THE WITNESS: So, Yvette Wang has just 22 walked into the room. 23 A. So, the peeking was a screenshot, I 24 believe, and I only saw it for a flash myself, of 25 a CITIC name and maybe an address or something.</p>	<p style="text-align: right;">Page 57</p> <p>1 Q. Had you looked at these screenshots or 2 information prior to the meeting? 3 A. No, I don't believe I did. 4 Q. Okay. 5 A. Because, again, we compartmentalize 6 stuff. 7 Q. So that was Dr. Waller's aspect of this 8 presentation, he handled that? 9 A. I agree. 10 Q. Did you tell Eastern or the people 11 present that you had enough information about 12 this person, Ms. Suen, to prove that she had 13 committed crimes? 14 A. First of all, we had no idea who 15 Eastern was, so I don't know what you mean about 16 Eastern. 17 Q. I'm obviously talking about Eastern 18 Profit. Let's just put it this way -- 19 A. Yeah, but we're not here about Eastern 20 Profit, as you understand. I never heard of 21 Eastern Profit until there was a contract. 22 Q. Right. Did you ever tell the people 23 present at this meeting that you had enough 24 information to prove that Ms. Suen had committed 25 crimes?</p>

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<p style="text-align: right;">Page 58</p> <p>1 A. I don't recall. Mike would know the 2 answer to that. 3 Q. Do you recall Mr. Waller talking about 4 crimes or anything like that at this meeting? 5 A. I wouldn't call them crimes. I think 6 they were asking for investigative background. 7 Miles Guo wanted to have as much information 8 on -- investigative background on a couple of 9 people, and I think she was the first and only 10 person he actually gave me -- gave us the name 11 about earlier, as a sort of trial. 12 Q. And you understood that Strategic 13 Vision wouldn't be compensated for this -- 14 A. No. 15 Q. -- project? 16 A. Not -- well, we -- 17 Q. And what I mean by project is this 18 little presentation? 19 A. No. It was just to show them what we 20 had a certain capacity of being able to do. It 21 was a limited capacity at that time. 22 Q. Do you understand why the information 23 was requested, what the goal was? 24 A. The goal was probably to sort of maybe 25 test some of the work that we could do</p>	<p style="text-align: right;">Page 60</p> <p>1 A. But you're asking about the content of 2 the conversation and where it went and who was 3 involved and why -- 4 Q. Um-hum. 5 A. -- right? 6 Q. I'm asking whether or not you knew why 7 the research was requested. That's what I'm 8 trying to understand. 9 A. We have no idea what Yvette did with 10 it. We have no idea what Guo did with it. We 11 have no idea what happened to it. 12 Q. So Strategic Vision didn't care what 13 the research was going to be used for one way or 14 another? 15 A. We cared very much what it was going to 16 be used for. We are very adamantly 17 anti-communist. 18 Q. I see. 19 A. We are very pro-democracy. Both Mike 20 and I are adamantly pro-democracy. 21 Q. So did you understand that the research 22 would be used to fight against the communist 23 party in China? 24 A. Correct. We thought. We were not sure 25 what they were going to do with it. Maybe he was</p>
<p style="text-align: right;">Page 59</p> <p>1 compartmentally. 2 Q. Let me just be a little more specific 3 then. Did you understand what the end goal of 4 the research project as a whole was, what the 5 requesters of the information were trying to do? 6 A. For the entire project? 7 Q. Yes. Why did they want this 8 investigatory research? 9 A. Well, that's a really good question. 10 Q. That's why I'm asking. Do you know? 11 MR. SCHMIDT: If you know or you don't. 12 A. I don't know. 13 Q. Okay. You never discussed what the 14 research would be used for or anything like that 15 with Mr. Guo or Ms. Wang or Mr. Han? 16 A. No. 17 Q. Did you think that it was involved with 18 the political conversations you guys had had 19 concerning China, the communist party? 20 A. Oh, I'm sure it had to do with the 21 communist party. I mean, Yvette certainly was 22 part of the communist party, and her parents were 23 part of the communist party regime. So, and she 24 was -- 25 Q. I didn't ask you about that at all.</p>	<p style="text-align: right;">Page 61</p> <p>1 going to run it both ways. We don't know. 2 Q. I'm only asking what you thought. 3 A. Well, I just gave you my opinion. 4 Q. Of course. And so, did you understand 5 that the investigatory research that was 6 collected would ultimately be publicized? 7 A. Probably, if we ended up with -- I 8 mean, that was up to Guo to decide what he was 9 going to do with it. We certainly were not going 10 to publish it because we had strict 11 confidentiality agreements, but he didn't, 12 apparently, because he published a number of the 13 slides already on his sites. 14 Q. Let's just talk about the 15 confidentiality agreement. What do you mean by 16 that, when you said you had confidentiality 17 agreements? 18 A. We had -- well, that was later in the 19 agreement itself. 20 Q. Oh, that's what you're referring to. 21 Okay. 22 A. Well, you know precisely what I'm 23 referring to. 24 MR. SCHMIDT: Just answer the 25 questions.</p>

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<p style="text-align: right;">Page 62</p> <p>1 Q. I really don't. I'm just trying to</p> <p>2 be –</p> <p>3 THE WITNESS: I know, he knows what I'm</p> <p>4 referring to.</p> <p>5 Q. I actually don't, so you'll have to</p> <p>6 forgive me. And so, what was the response to</p> <p>7 this presentation of the CITIC, as you – what</p> <p>8 did you describe it as, the peering over the</p> <p>9 wall?</p> <p>10 A. I'm sorry?</p> <p>11 Q. What was the response of Mr. Han or</p> <p>12 Ms. Wang or Mr. Guo to your presentation?</p> <p>13 A. I suppose they were interested. I</p> <p>14 wasn't – I wasn't that surprised that something</p> <p>15 couldn't be brought up off the internet from some</p> <p>16 of the investigators that Mike would have known</p> <p>17 about.</p> <p>18 Q. So, in other words, you understood that</p> <p>19 this was what Mike's team or contacts could</p> <p>20 provide?</p> <p>21 A. Yes.</p> <p>22 Q. Did you feel that the recipients of</p> <p>23 this information were impressed by it?</p> <p>24 A. I have no idea.</p> <p>25 Q. They didn't say anything like, wow,</p>	<p style="text-align: right;">Page 64</p> <p>1 that?</p> <p>2 A. Yes.</p> <p>3 Q. Can you describe what this capability</p> <p>4 is? It says it was originally developed by the</p> <p>5 U.S. military.</p> <p>6 A. Yes, this is one of the things that</p> <p>7 Mike was aware of.</p> <p>8 Q. Are you aware of it, or you don't know</p> <p>9 about this service?</p> <p>10 A. I'm aware of it, but he's more</p> <p>11 experienced with it.</p> <p>12 Q. Well, let's – what do you know about</p> <p>13 it?</p> <p>14 A. Exactly what it says. I mean, I'm</p> <p>15 aware of it. I don't know any more than – than</p> <p>16 that. Mike is the one who is fully aware of it.</p> <p>17 Q. I appreciate that Mr. Waller might know</p> <p>18 more about it than you, but I'm asking what you</p> <p>19 know.</p> <p>20 A. I'm aware of what this paragraph says.</p> <p>21 Q. You don't know anything else about this</p> <p>22 capability or what it is?</p> <p>23 A. I'm aware of the social media and text</p> <p>24 messaging communications in multiple languages.</p> <p>25 Q. Okay. But you don't provide this</p>
<p style="text-align: right;">Page 63</p> <p>1 this is great or –</p> <p>2 A. I have no idea.</p> <p>3 Q. You mean you don't remember or you just</p> <p>4 don't –</p> <p>5 A. I have no idea.</p> <p>6 Q. So you know the information was</p> <p>7 presented, but you don't recall how it was</p> <p>8 received?</p> <p>9 A. I'm sure it was favorable.</p> <p>10 MR. GRENDI: Let's take a little break</p> <p>11 and we'll come back in five or 10 minutes.</p> <p>12 THE VIDEOGRAPHER: Going off the record</p> <p>13 at 11:09.</p> <p>14 (Whereupon, a short recess was taken.)</p> <p>15 THE VIDEOGRAPHER: We're now back on</p> <p>16 the record at 11:21.</p> <p>17 BY MR. GRENDI:</p> <p>18 Q. Just turning to SVUS84 of that exhibit,</p> <p>19 that's the Bates number in the bottom right-hand</p> <p>20 corner.</p> <p>21 A. Yes. Yes, yes, yes. So 84, okay. 83.</p> <p>22 84, yes.</p> <p>23 MR. SCHMIDT: Final page.</p> <p>24 Q. You see where it says, "Total Social</p> <p>25 Media Awareness," there's a bullet point for</p>	<p style="text-align: right;">Page 65</p> <p>1 service, this isn't something that Strategic</p> <p>2 Vision does itself?</p> <p>3 A. Only through our teams do we do this.</p> <p>4 Q. Okay. Is this service part of</p> <p>5 investigatory research or is it separate?</p> <p>6 A. It would probably be part of the full</p> <p>7 package. We were not sure what Miles Guo wanted,</p> <p>8 so we tried to create a sort of a menu, as I</p> <p>9 mentioned earlier.</p> <p>10 Q. So this document contains ideas for</p> <p>11 Mr. Guo in terms of services that Strategic</p> <p>12 Vision can provide?</p> <p>13 A. Correct. Strategic Vision and its</p> <p>14 team.</p> <p>15 MR. GRENDI: This is going to be Wallop</p> <p>16 5.</p> <p>17 (Wallop Exhibit 5, Handwritten</p> <p>18 document, marked for identification.)</p> <p>19 Q. Looking at Wallop 5, is this your</p> <p>20 handwriting here?</p> <p>21 A. It is.</p> <p>22 Q. And who are these individuals listed on</p> <p>23 this document?</p> <p>24 A. Guo asked for some references of</p> <p>25 individuals in the Middle East, and I wrote them</p>

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<p style="text-align: right;">Page 66</p> <p>1 down.</p> <p>2 Q. By references, what – does that mean</p> <p>3 people who you've worked with or provided</p> <p>4 services to; who are they?</p> <p>5 A. Both.</p> <p>6 Q. So Strategic Vision has provided</p> <p>7 services to some of the people on this list?</p> <p>8 A. Some of the people, yes.</p> <p>9 Q. Which ones?</p> <p>10 A. I can't disclose that.</p> <p>11 Q. How many of them?</p> <p>12 A. I can't disclose that.</p> <p>13 Q. Were any of the services provided to</p> <p>14 the people on this list investigatory research?</p> <p>15 A. Some. He asked for both personal and</p> <p>16 professional. I just gave him a light list of</p> <p>17 individuals that – then there's a lot of Chinese</p> <p>18 down here at the bottom, Chinese characters, so I</p> <p>19 don't know what that's about.</p> <p>20 Q. I figured as much. So these are just</p> <p>21 individuals in the Middle East that are, as you</p> <p>22 put it, references?</p> <p>23 A. Yes.</p> <p>24 Q. Did you –</p> <p>25 A. These were all UAE, as a matter of</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. Why not?</p> <p>2 MR. SCHMIDT: Other clients beyond this</p> <p>3 sheet?</p> <p>4 MR. GRENDI: Yeah.</p> <p>5 A. Because they're private clients.</p> <p>6 Q. Are the individuals on this list</p> <p>7 private clients?</p> <p>8 A. Yes and no.</p> <p>9 Q. Why did you tell him about some of your</p> <p>10 private clients on this document?</p> <p>11 A. He asked me – I had permission from</p> <p>12 these individuals to list them, if need be, with</p> <p>13 somebody – he went on and on about his</p> <p>14 relationships in the UAE, and now – now I</p> <p>15 understand that he defrauded the UAE out of</p> <p>16 \$3 billion, particularly one of the families</p> <p>17 that's listed on this page, I believe, and that's</p> <p>18 public information.</p> <p>19 Q. Which one is that?</p> <p>20 A. The Al Nahyan family. So, you know, it</p> <p>21 was pretty cheeky to ask me for references in the</p> <p>22 UAE, given his reputation in the UAE.</p> <p>23 Q. And this alleged fraud of people in the</p> <p>24 UAE, when did you hear about that?</p> <p>25 A. It was all over the news media. All</p>
<p style="text-align: right;">Page 67</p> <p>1 fact. He asked specifically for UAE, so</p> <p>2 that's – these are all UAE.</p> <p>3 Q. What about references from people from</p> <p>4 other countries, did you provide that information</p> <p>5 to Mr. Guo?</p> <p>6 A. He did not ask.</p> <p>7 Q. Okay. But you didn't provide that</p> <p>8 information?</p> <p>9 A. He did not ask.</p> <p>10 Q. I didn't ask whether he asked. I –</p> <p>11 A. No.</p> <p>12 Q. – asked you whether –</p> <p>13 A. No.</p> <p>14 Q. – you gave that information?</p> <p>15 A. No.</p> <p>16 Q. Okay. So, in terms of Strategic</p> <p>17 Vision's clients, only some of the people on the</p> <p>18 list are people that you told Mr. Guo about being</p> <p>19 Strategic Vision's clients, is that right?</p> <p>20 A. He asked for references, personal and</p> <p>21 professional, in the UAE, and I gave him these</p> <p>22 names.</p> <p>23 Q. And you never described any of</p> <p>24 Strategic Vision's other clients to Mr. Guo?</p> <p>25 A. Certainly not.</p>	<p style="text-align: right;">Page 69</p> <p>1 you have to do is research it.</p> <p>2 Q. I was asking when you found out about</p> <p>3 it?</p> <p>4 A. I don't remember.</p> <p>5 Q. Thank you. Was it before or after you</p> <p>6 gave this list to Mr. Guo, that you found out</p> <p>7 that he was –</p> <p>8 A. After.</p> <p>9 Q. – allegedly involved in fraud?</p> <p>10 A. After.</p> <p>11 Q. Okay. And you don't have any personal</p> <p>12 knowledge about Mr. Guo's relationships with</p> <p>13 anyone in the United Arab Emirates, do you?</p> <p>14 A. I'm not going to answer that, because I</p> <p>15 think it would be revealing confidential.</p> <p>16 MR. SCHMIDT: Do you have any personal</p> <p>17 knowledge?</p> <p>18 MR. GRENDI: I'm just trying to know</p> <p>19 why – whether she knows about this alleged</p> <p>20 fraud personally or whether she just read</p> <p>21 about it in the media.</p> <p>22 MR. SCHMIDT: Why don't we ask that</p> <p>23 question. I think we've got to go slower</p> <p>24 with these questions. Why don't you answer</p> <p>25 the question. Do you have any information</p>

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<p style="text-align: right;">Page 70</p> <p>1 about the fraud beyond –</p> <p>2 THE WITNESS: Yes.</p> <p>3 MR. SCHMIDT: – what you read in the</p> <p>4 media?</p> <p>5 THE WITNESS: Yes.</p> <p>6 Q. Okay. And that's from who; how did you</p> <p>7 hear about that?</p> <p>8 You can look at me. I'm asking you the</p> <p>9 questions.</p> <p>10 A. Privileged – privileged sources.</p> <p>11 Q. Okay. So you're refusing to answer</p> <p>12 that question based on privilege?</p> <p>13 A. Yes.</p> <p>14 Q. And what privilege is that?</p> <p>15 MR. SCHMIDT: Do you want to go talk</p> <p>16 about it?</p> <p>17 THE WITNESS: Yes.</p> <p>18 MR. SCHMIDT: Why don't we go off the</p> <p>19 record and see what's going on.</p> <p>20 MR. GRENDI: I'll tell you what, why</p> <p>21 don't we just put a pin in it, and keep</p> <p>22 going.</p> <p>23 MR. SCHMIDT: That's fine, too. Okay,</p> <p>24 we can do it at a break.</p> <p>25 MS. TESKE: Let's take a break for a</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. And which family is that?</p> <p>2 A. The Al Nahyan family.</p> <p>3 Q. Is that on this list? I'm sorry, I</p> <p>4 have trouble reading your handwriting.</p> <p>5 A. Yes, it is.</p> <p>6 Q. That's the one, two, three, four –</p> <p>7 fifth one from the top?</p> <p>8 A. Yes.</p> <p>9 Q. And what did they say to you about</p> <p>10 that?</p> <p>11 A. When I mentioned his name, they said</p> <p>12 that, yes, they were fully aware of him and that</p> <p>13 it was not a pleasant experience.</p> <p>14 Q. Why were you talking to the Al Nahyan</p> <p>15 family about Mr. Guo?</p> <p>16 A. Because Mr. Guo, I believe, had been</p> <p>17 telling me with this document that he knew all of</p> <p>18 these people, and I was checking on whether he</p> <p>19 did know any of these people. And so it came up</p> <p>20 that he defrauded the UAE and the family of over</p> <p>21 \$3 billion, as you well know.</p> <p>22 Q. And you didn't agree to keep your</p> <p>23 relationship with Mr. Guo confidential when you</p> <p>24 were speaking with him?</p> <p>25 A. That had nothing to do with</p>
<p style="text-align: right;">Page 71</p> <p>1 quick second.</p> <p>2 THE VIDEOGRAPHER: Off the record at</p> <p>3 11:29.</p> <p>4 (Whereupon, a short recess was taken.)</p> <p>5 THE VIDEOGRAPHER: Back on the record</p> <p>6 at 11:35.</p> <p>7 MR. SCHMIDT: We just stepped out to</p> <p>8 discuss if there was any potential privilege</p> <p>9 issue. I think it's more of a</p> <p>10 confidentiality issue. She had actually</p> <p>11 already revealed the answer to the question</p> <p>12 in response to a prior question. And I</p> <p>13 think the question when we left was if she</p> <p>14 knew anything beyond what she had read in</p> <p>15 the public papers, and the answer was yes.</p> <p>16 And I think your next question was, what.</p> <p>17 And I think Ms. French is ready to respond</p> <p>18 to that.</p> <p>19 Q. Go ahead. How do you know something</p> <p>20 beyond the public record about Mr. Guo allegedly</p> <p>21 stealing \$3-1/2 billion from the United Arab</p> <p>22 Emirates?</p> <p>23 A. Based on conversations that I had with</p> <p>24 members of the family with whom he allegedly</p> <p>25 defrauded them of over \$3 billion.</p>	<p style="text-align: right;">Page 73</p> <p>1 confidentiality. He was the one that gave me –</p> <p>2 he asked me for these references. I wanted to</p> <p>3 make sure we had a reference on him. He said</p> <p>4 that he worked very closely with the UAE, and it</p> <p>5 turned out, I guess, he did.</p> <p>6 Q. When were these conversations you had</p> <p>7 with the Al Nahyan family?</p> <p>8 A. Oh, probably in – probably about six</p> <p>9 months after the contract began.</p> <p>10 Q. So you were checking references on</p> <p>11 Mr. Guo after the agreement was over with?</p> <p>12 A. Yes. We had trusted him up until that</p> <p>13 time.</p> <p>14 Q. Sure.</p> <p>15 MR. SCHMIDT: Let's not make any</p> <p>16 commentary.</p> <p>17 MR. GRENDI: That's fine.</p> <p>18 Q. Let's go with the next exhibit.</p> <p>19 (Wallop Exhibit 6, Document entitled</p> <p>20 "Time to Get Them Beginning the</p> <p>21 Psycho-Political Campaign For China", marked</p> <p>22 for identification.)</p> <p>23 Q. Ms. Wallop, do you recognize this</p> <p>24 document?</p> <p>25 A. Yes, this is one of Mike's documents.</p>

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<p style="text-align: right;">Page 74</p> <p>1 Q. It's called "Time to Get Them." 2 Do you know how that title was reached, 3 created? 4 A. Yes, yes. 5 Q. How's that? 6 A. It came as a result of conversations 7 with Guo, Lianchao and Mike and myself regarding 8 the – regarding the communists working within 9 The United States, from China DRC, as well as 10 elsewhere. 11 Q. So in the chronology of meetings we've 12 been talking about, was this document created 13 before the first meeting, the second meeting, the 14 third meeting? When did it – 15 A. Oh, it had to have been after the 16 second or third meeting, because there's this 17 photograph of Anita here. 18 Q. And that's on SVUS387? If you look at 19 the bottom right-hand corner – 20 A. Correct. 21 Q. – that's where those – 22 A. Or maybe that's Yvette. I'm not sure. 23 No, I think it is Anita. 24 Q. Okay. Was this a PowerPoint 25 presentation?</p>	<p style="text-align: right;">Page 76</p> <p>1 presented? 2 A. Well, it would have been one of the 3 four – I mean all four of us. It would have 4 been Lianchao, Guo, myself and Mike. 5 Q. Okay. Do you remember where that – 6 A. And possibly Yvette. 7 Q. Okay. 8 A. I don't remember. 9 Q. And do you remember where that was? 10 A. In his flat, in his apartment at the 11 Sherry-Netherlands. 12 Q. Okay. 13 A. All meetings were there with him. 14 Q. That's helpful. So you never met with 15 Mr. Guo in Washington, D.C.? 16 A. No. 17 Q. Okay. Let's look at 387. It says, 18 "build and operate a secret system for 19 micro-targeted intelligence collection and 20 analysis." Do you see that? 21 A. Yes. 22 Q. Is that a service that Strategic Vision 23 would provide or someone else? 24 A. Through Mike and his teams, and some of 25 my people, yes.</p>
<p style="text-align: right;">Page 75</p> <p>1 A. Yes. 2 Q. And was it presented as a PowerPoint on 3 a computer or did you print it out? How was 4 it – 5 A. It might have been on a USB key. 6 Q. And did you participate in creating 7 this document or did Mr. – Dr. Waller create it 8 himself? 9 A. Dr. Waller did much of it. I worked 10 with him on some of it; not all of it, but some 11 of it. 12 Q. So you made edits or – 13 A. Yes. 14 Q. And when was this presented to – well, 15 let's start with striking that. 16 Who was this presented to? 17 A. Well, this would have been presented to 18 Guo. 19 Q. Anyone else? 20 A. And probably Lianchao. And, obviously, 21 myself. I can't remember if Yvette was in there 22 or not. He often didn't want her in the room, 23 so, who knows. 24 Q. I understand. But you don't recall 25 specifically who was in the room when this was</p>	<p style="text-align: right;">Page 77</p> <p>1 Q. What do you mean by your people? 2 A. Some of my channels, as we discussed 3 earlier. 4 Q. I see. So in terms of this service, 5 the game plan was for Dr. Waller to do most of 6 the research, is that fair to say, through his 7 channels? 8 A. I would say it was equal. 9 Q. Okay. 10 A. It depends. I mean, it depended on 11 which target we were working with. 12 Q. So I have some understanding of what 13 Dr. Waller's process and capabilities were from 14 his deposition. I want to know what – what it 15 is that you personally would provide as a service 16 in connection with micro-targeted intelligence, 17 collection and analysis? 18 A. It depended on which target and which 19 channels we both used collectively to bring the 20 information together on individuals or documents. 21 Q. Right. And I'm trying to understand 22 what – 23 A. I don't – 24 Q. – process – 25 A. I can't answer that.</p>

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<p style="text-align: right;">Page 78</p> <p>1 Q. Well, I didn't even ask a question. So</p> <p>2 I want you to just wait for me to ask, and then</p> <p>3 you can answer.</p> <p>4 A. Go ahead.</p> <p>5 Q. Yes, thank you. So I want to</p> <p>6 understand what part of the process you would</p> <p>7 participate in. What would you do to help in the</p> <p>8 collection process or accessing of the channels</p> <p>9 process?</p> <p>10 A. Collection and gathering. It was like</p> <p>11 hunting and gathering. We both did it.</p> <p>12 Q. And what would you do in connection</p> <p>13 with this engagement? What was it that you would</p> <p>14 do?</p> <p>15 A. We would collect –</p> <p>16 Q. You.</p> <p>17 A. –through my channels.</p> <p>18 Q. Right.</p> <p>19 A. Him through his channels.</p> <p>20 Q. And what channels did you access in</p> <p>21 connection with this engagement?</p> <p>22 MR. SCHMIDT: Just to – objection for</p> <p>23 a second here. This is a 30(b)(6).</p> <p>24 THE WITNESS: I don't understand the</p> <p>25 question.</p>	<p style="text-align: right;">Page 80</p> <p>1 you did, Strategic Vision, to collect</p> <p>2 information?</p> <p>3 MR. SCHMIDT: Objection. She's talked</p> <p>4 about going out and getting Mike Waller and</p> <p>5 putting that together –</p> <p>6 MR. GRENDI: I'm asking about anything</p> <p>7 else.</p> <p>8 MR. SCHMIDT: Okay, anything else.</p> <p>9 A. Collecting teams. Collecting teams.</p> <p>10 Q. Let's do it this way. Setting aside</p> <p>11 what Mr. Waller and his teams did. Was there any</p> <p>12 other teams accessed to provide information in</p> <p>13 connection with this investigatory research?</p> <p>14 A. Yes.</p> <p>15 Q. And who were they?</p> <p>16 A. There were some from the U.K., there</p> <p>17 were some from Israel, there were some from the</p> <p>18 Middle East, there were some from our networks.</p> <p>19 Q. And now I'm talking about you</p> <p>20 personally.</p> <p>21 A. Yes.</p> <p>22 Q. Are these people that you personally</p> <p>23 contacted?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. That's all I'm trying to</p>
<p style="text-align: right;">Page 79</p> <p>1 MR. SCHMIDT: So you're saying you as</p> <p>2 Strategic Vision, or are you saying you</p> <p>3 French Wallop? How do you want to do it?</p> <p>4 MR. GRENDI: Let's do Strategic Vision.</p> <p>5 MR. SCHMIDT: Yeah. I mean, that's</p> <p>6 really the question here.</p> <p>7 MR. GRENDI: That's fine.</p> <p>8 THE WITNESS: Okay.</p> <p>9 Q. What did Strategic Vision do in terms</p> <p>10 of collection and analysis?</p> <p>11 A. That's what we did, we did collection</p> <p>12 and analysis.</p> <p>13 Q. So there's no more specificity –</p> <p>14 A. Through our own sources.</p> <p>15 Q. – to it than that? What does that</p> <p>16 mean?</p> <p>17 A. How do you put a legal case together?</p> <p>18 You have to start with bits and pieces. So</p> <p>19 that's what we were doing. We were each</p> <p>20 collecting bits and pieces to make the cases.</p> <p>21 Q. Let me ask it this way. Did you ask</p> <p>22 people in your network, do you know who Anita</p> <p>23 Suen is? What do you know about her?</p> <p>24 A. No.</p> <p>25 Q. So I'm trying to understand what it is</p>	<p style="text-align: right;">Page 81</p> <p>1 understand. Without naming any names, would that</p> <p>2 involve calling people on the phone or emailing</p> <p>3 them?</p> <p>4 A. Rarely. It's face-to-face.</p> <p>5 MR. SCHMIDT: Just listen to the</p> <p>6 question. Don't be distracted by the</p> <p>7 document for now.</p> <p>8 Q. And so, in connection with the research</p> <p>9 in this matter, how many face-to-face meetings</p> <p>10 did you have with people in your contacts? I'm</p> <p>11 talking about you, Ms. Wallop.</p> <p>12 MR. SCHMIDT: Objection.</p> <p>13 A. I have no idea. Many.</p> <p>14 Q. You said you rarely do telephone calls.</p> <p>15 Did you do some in connection with this research</p> <p>16 agreement?</p> <p>17 A. No.</p> <p>18 Q. What about internet research, did you</p> <p>19 do any internet research in connection with this?</p> <p>20 MR. SCHMIDT: Objection. Her</p> <p>21 personally?</p> <p>22 Q. Strategic Vision. Did Strategic Vision</p> <p>23 do any internet research in connection with this</p> <p>24 research?</p> <p>25 A. Lightly. That was not our – that was</p>

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<p style="text-align: right;">Page 82</p> <p>1 not our way of doing it.</p> <p>2 Q. And what about you personally?</p> <p>3 A. No.</p> <p>4 Q. It says in this document that the first</p> <p>5 ten targets are identified, do you see that?</p> <p>6 A. What page?</p> <p>7 Q. 387.</p> <p>8 A. Yes.</p> <p>9 Q. What did you understand that to mean?</p> <p>10 A. Well, Guo gave us – Miles Guo gave us</p> <p>11 a large packet of names, and, in that – in the</p> <p>12 first ten, which they upped it to 15 in the first</p> <p>13 month, but the first ten targets were identified,</p> <p>14 and then they changed their mind and asked for 15</p> <p>15 for the first month. So that's – those were his</p> <p>16 targets.</p> <p>17 Q. So these ten targets, are those</p> <p>18 referred to as fish in the signed research</p> <p>19 agreement?</p> <p>20 A. Correct.</p> <p>21 Q. And it says, "monitor the ten targets</p> <p>22 for several months to understand their habits,</p> <p>23 patterns, personal and professional networks,</p> <p>24 businesses and corruption." Do you see that?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. When Guo threw that whole document down</p> <p>2 on the coffee table in his apartment and he said,</p> <p>3 these are the people I want investigated, these</p> <p>4 are – I said, where did this list come from?</p> <p>5 And he said, I paid \$250 million for this list.</p> <p>6 I said, wow, okay. So that's when I knew who the</p> <p>7 first ten targets were.</p> <p>8 MR. GRENDI: Let's do Exhibit 7.</p> <p>9 (Wallop Exhibit 7, Document entitled</p> <p>10 "1: Anita Yiu Suen", marked for</p> <p>11 identification.)</p> <p>12 Q. Do you recognize what's been marked as</p> <p>13 Wallop 7?</p> <p>14 A. Correct, I do.</p> <p>15 Q. And is this the document that you just</p> <p>16 said Mr. Guo threw down on the table?</p> <p>17 A. It looks like it.</p> <p>18 Q. Okay. So, to your recollection,</p> <p>19 Mr. Guo threw a paper copy of this document onto</p> <p>20 a table at some point during a meeting?</p> <p>21 A. No, on – onto his coffee table in his</p> <p>22 sun room, yes.</p> <p>23 Q. When was that?</p> <p>24 A. During the – probably the second or</p> <p>25 third meeting we had with him in New York, in</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. Who would do that work of monitoring?</p> <p>2 A. Our team.</p> <p>3 Q. And by our team, what encompasses the</p> <p>4 Strategic Vision team for this research</p> <p>5 agreement?</p> <p>6 MR. SCHMIDT: Objection. Go ahead.</p> <p>7 A. The particular team, we called it Team</p> <p>8 1, and that's what they were assigned to do.</p> <p>9 Q. So Team 1 was assigned the monitoring</p> <p>10 of the ten targets referred to here?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. And do you know the name of</p> <p>13 anyone on Team 1?</p> <p>14 A. No.</p> <p>15 Q. Do you know the leader of Team 1, the</p> <p>16 name of the leader of Team 1?</p> <p>17 A. I know his acronym. I don't know his</p> <p>18 name, his full name. This was through Mike.</p> <p>19 Q. So you don't know the full name of the</p> <p>20 leader of Team 1?</p> <p>21 MR. SCHMIDT: Yes or no, if you know.</p> <p>22 Q. I'm asking a yes or no.</p> <p>23 A. No.</p> <p>24 Q. So, specifically, do you know when the</p> <p>25 first ten targets were identified?</p>	<p style="text-align: right;">Page 85</p> <p>1 December of 2017.</p> <p>2 Q. So did you keep that paper copy that</p> <p>3 was thrown on the table?</p> <p>4 A. Well, I had this copy, I mean, the copy</p> <p>5 of the copy. I mean, the original that he gave</p> <p>6 us.</p> <p>7 Q. I see. So you retained a paper copy of</p> <p>8 what's been marked as Wallop 7?</p> <p>9 A. That's correct.</p> <p>10 Q. And was that – that was before the</p> <p>11 contract was signed, right, the research</p> <p>12 agreement that's the subject of this action?</p> <p>13 A. No. I think we – I saw the document,</p> <p>14 but we didn't get the full document because of</p> <p>15 the famous flash drives that were corrupted –</p> <p>16 Q. Right, but –</p> <p>17 A. – by Yvette.</p> <p>18 Q. – I just want to understand what</p> <p>19 happened to the paper version that was –</p> <p>20 A. Oh, I didn't – he didn't give that to</p> <p>21 us at the time. He kept his copy.</p> <p>22 Q. You didn't receive –</p> <p>23 A. No, no, no –</p> <p>24 Q. – a paper copy from him?</p> <p>25 A. – no, no, no. He just showed it to</p>

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<p style="text-align: right;">Page 86</p> <p>1 us.</p> <p>2 Q. I see.</p> <p>3 A. He threw his copy down on the table.</p> <p>4 Q. And this was at the second or third</p> <p>5 meeting?</p> <p>6 A. Yeah.</p> <p>7 Q. Okay.</p> <p>8 A. Yes.</p> <p>9 Q. And you did not retain a copy from that</p> <p>10 meeting?</p> <p>11 A. No.</p> <p>12 Q. And did you go through the paper copy</p> <p>13 that was on the table?</p> <p>14 A. With him?</p> <p>15 Q. Yes. Or on your own.</p> <p>16 A. Well, we glanced at it. Mike was</p> <p>17 there. We glanced at it to try to get an idea as</p> <p>18 to who it was, what it was.</p> <p>19 Q. We'll come back to this. Going back to</p> <p>20 Exhibit 6. On 387, it says, "Document everything</p> <p>21 as leverage to gain concessions, protect people,</p> <p>22 use as political weapon, or as aid in criminal</p> <p>23 prosecution and asset recovery."</p> <p>24 Do you see that, it's the fourth or</p> <p>25 fifth bullet down?</p>	<p style="text-align: right;">Page 88</p> <p>1 A. I don't remember. I don't know</p> <p>2 precisely.</p> <p>3 Q. Okay. And you don't remember</p> <p>4 discussing whether -- what the political weapon</p> <p>5 would be?</p> <p>6 A. Well, a political weapon, which is what</p> <p>7 Guo wanted to use towards his investigation of</p> <p>8 these individuals. He was going to use it</p> <p>9 against them, for whatever purpose.</p> <p>10 Q. But you don't know the purpose?</p> <p>11 A. Not entirely.</p> <p>12 Q. Okay. A couple of bullets down it</p> <p>13 says, "Break the Party's control of corrupt</p> <p>14 information" -- or "corruption information" I</p> <p>15 should say. Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. What is "the Party's control"? Which</p> <p>18 party are we talking about there?</p> <p>19 A. Talking about the communist party.</p> <p>20 Q. And what control of corruption</p> <p>21 information does the communist party have?</p> <p>22 A. Well, Guo had said that the CCP, or the</p> <p>23 communist party of China, there was a great deal</p> <p>24 of corruption within the leadership, and, as a</p> <p>25 result of that, he wanted to find as much</p>
<p style="text-align: right;">Page 87</p> <p>1 A. I don't have it.</p> <p>2 Q. Oh, I'm sorry.</p> <p>3 A. So, what page?</p> <p>4 Q. The same one we've been looking at,</p> <p>5 387.</p> <p>6 A. So what would you like to look at?</p> <p>7 Q. Where it says, "Document everything as</p> <p>8 leverage to gain concessions, protect people, use</p> <p>9 as political weapon, or as aid in criminal</p> <p>10 prosecution and asset recovery"?</p> <p>11 A. Correct.</p> <p>12 Q. What is the -- what was that about;</p> <p>13 what does that mean in terms of the services to</p> <p>14 be provided?</p> <p>15 A. This was what Mike was referring to</p> <p>16 with regard to the Team 1.</p> <p>17 Q. So Team 1 was going to?</p> <p>18 A. Take a look at that, yes.</p> <p>19 Q. And what kind of leverage was sought?</p> <p>20 A. I guess, criminal leverage, depending</p> <p>21 upon the individuals that we were investigating,</p> <p>22 per Guo's instructions.</p> <p>23 Q. It also says "protect people." What</p> <p>24 was -- to your mind, what was the -- what was</p> <p>25 that about?</p>	<p style="text-align: right;">Page 89</p> <p>1 corruption as possible, and he wanted us to</p> <p>2 investigate and retrieve that kind of corruption.</p> <p>3 In other words, funds that would have been taken</p> <p>4 out of the country illegally, cash payments, all</p> <p>5 of these things that were part of that.</p> <p>6 Q. I understand. And so going to the next</p> <p>7 page, 388. It says, "Reduce political threats to</p> <p>8 yourself and your cause."</p> <p>9 What did you understand is the</p> <p>10 political threats to whoever yourself or your</p> <p>11 cause is there?</p> <p>12 A. That was to Guo.</p> <p>13 Q. Okay.</p> <p>14 A. Political threats to Guo and Guo's</p> <p>15 cause.</p> <p>16 Q. And what were those political threats?</p> <p>17 A. Well, he said that they were monetary</p> <p>18 and political, and that many people were after</p> <p>19 him either for monetary damages or corruption,</p> <p>20 both by the Chinese officials as well as,</p> <p>21 perhaps, his own corruption issues. I don't</p> <p>22 know.</p> <p>23 Q. Did you look into that at all in terms</p> <p>24 of --</p> <p>25 A. This was a preliminary -- this was a</p>

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<p style="text-align: right;">Page 90</p> <p>1 preliminary document that Mike had put together; 2 so, no, we were not under contract to look into 3 it. 4 Q. Okay. So you didn't do any work 5 regarding Mr. Guo or his business prior to – 6 A. The contract? 7 Q. – the execution of the contract on or 8 about January 6, 2018? 9 A. No. 10 Q. You didn't access your network to 11 determine whether this was someone you wanted to 12 do business with or not? 13 A. We had Bill Gertz, who was one of the 14 finest intellects on Chinese corruption, and 15 reporters, journalists, and also Lianchao, again, 16 of the highest sterling standards. When they 17 asked us to look into it, that's what we did. 18 That was looking into putting together a program 19 that would help somebody that we believed at the 20 time was absolutely anti-communist. 21 Q. I see. So you relied up – let me put 22 it this way. Strategic Vision relied upon the 23 recommendation of Bill Gertz and Lianchao Han in 24 terms of deciding to do business with, or 25 deciding to enter into the research agreement?</p>	<p style="text-align: right;">Page 92</p> <p>1 with Russian opposition and Chinese expats? 2 A. Through me and certain ideas that we 3 had to combine our ideological belief in 4 democracy. 5 Q. And – right. How would those ideas be 6 executed, what sort of – 7 A. Through dialogue. 8 Q. – activities? 9 A. Through dialogue. 10 Q. And you also have links with Chinese 11 people inside Russia? 12 A. We would have, yes. 13 Q. That's you and Mr. Waller? 14 A. Yes. 15 Q. It says, "for propaganda and 16 organizational purposes." Do you see that? 17 A. Yes. 18 Q. What would be the propaganda and 19 organizational purposes? 20 A. Media and social media, probably. 21 Q. So, in other words, messaging of 22 anti-communist, pro-democracy rhetoric? 23 A. Correct. 24 Q. Would the Russian opposition group be 25 involved in collecting investigatory research or</p>
<p style="text-align: right;">Page 91</p> <p>1 A. Correct. 2 Q. Let's just go to SVUS390. 3 A. Um-hum. 4 Q. It says, "Network With Russian 5 Opposition and Chinese Expats." Do you see that? 6 A. Correct. 7 Q. Is this a service that you would 8 provide or Mr. Waller would provide? 9 A. Both of us did. 10 Q. Okay. And why was Strategic Vision 11 recommending that Mr. Guo network with Russian 12 opposition and Chinese expats? 13 A. Well, the photograph that you have 14 here, that's in this is Mikhail Khodorkovsky. 15 Okay? Mikhail Khodorkovsky is a client of mine, 16 and he is an anti-Putin and pro-democracy leader, 17 opposition leader for Russia; so, therefore, we 18 felt that this might be a good person for Guo to 19 essentially team up with on certain ideological 20 issues. 21 Q. And how would that synergy or 22 collaboration work? 23 A. Through me. 24 Q. Right. But just a little more 25 specificity. How would Mr. Guo, or whoever, team</p>	<p style="text-align: right;">Page 93</p> <p>1 is that a separate group? 2 A. It would be separate. 3 Q. Let's go to 394. It says, "Target 4 Intelligence Capability: Cost." 5 These costs here, are these prices that 6 Strategic Vision quoted? 7 A. In a preliminary discussion, yes. 8 Q. Okay. So, initially, Strategic Vision 9 was offering \$2,805,000 to have two teams monitor 10 one person? 11 A. Yes. 12 Q. And what would that monitoring entail, 13 just in terms of the types of surveillance or 14 investigatory work? 15 A. It was hugely complex, and – 16 MR. SCHMIDT: Keep going. 17 A. It was hugely complex, and it had to do 18 with all the investigative tentacles that we 19 could reach within our channels. 20 Q. So is that the full package of services 21 that Strategic Vision could provide in terms of 22 monitoring, that's like the full suite, call it 23 that? 24 A. Except that he didn't accept it. 25 Q. I understand that. But was this –</p>

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<p style="text-align: right;">Page 94</p> <p>1 A. This was a preliminary overview of some 2 of the things that we would have done. 3 Q. Right. And it says, "above for 1, but 4 with only one team: \$2,380,000"? 5 A. Correct. 6 Q. So, just conceptually, what's the 7 difference between one team and two teams, in 8 terms of what a client would get? 9 A. Because you obviously have to work with 10 both teams to define different sets of facts that 11 they are retrieving, and, out of those different 12 sets of facts, you compare the information on 13 both teams to see whether they are – whether 14 they match or whether one is adding something 15 else to the – to the individual that's being 16 monitored. 17 In other words, we're trying to combine 18 the information that we were retrieving so that 19 we would have one package, so to speak, for each 20 person, that would be better than just having one 21 team do it. 22 Q. I see. So the purpose of having two 23 teams in this context is to be able to 24 cross-check the teams against one another to see 25 if the information –</p>	<p style="text-align: right;">Page 96</p> <p>1 know that you're verifying. Because one team 2 supposedly never knows about the other team. 3 They won't bump into each other. So they're kept 4 completely separate. So the information that we 5 were – had expected to receive from the initial 6 dives into the first team, using just one team, 7 and then subsequently we – we went on our own 8 dime to the second team. 9 Q. Are you talking about research that was 10 actually performed or just conceptually how 11 Strategic Vision does things, as presented in 12 this – what's this called – in this document, 13 Exhibit 7? 14 A. Would you repeat the question. 15 Q. What I'm saying is, are you referring 16 to the Team 1 and Team 2 that were tasks in the 17 actual research agreement or what's being 18 described in this document? 19 A. What we were – it's a little bit of 20 both. 21 Q. Okay. And has Strategic Vision 22 previously employed dual teams to perform 23 investigatory research? 24 A. Not at this depth, but, yes. 25 Q. And did Strategic Vision sometimes only</p>
<p style="text-align: right;">Page 95</p> <p>1 A. Yes. 2 Q. – they're finding is consistent? 3 A. Yes, that's correct. 4 Q. But both teams would be doing, 5 essentially, the same thing; is that fair to say? 6 A. I don't think so. 7 Q. Okay. What would be the difference 8 between what Team 1 would do and what Team 2 9 would do in this context? 10 A. It would depend upon the information 11 that we gave each team as to which one would do 12 which dimension of retrieval. If you haven't 13 been in the game, you don't understand these 14 things, sorry. 15 Q. That's what I'm trying to understand. 16 MR. SCHMIDT: No comments. Just answer 17 his questions to the best of your ability, 18 okay? 19 THE WITNESS: I'm working on it. 20 MR. GRENDI: Thank you, Joe. 21 Q. And is there any other reason to set up 22 two teams, other than this cross-dimensional 23 referencing you've talked about? 24 A. It just makes – it makes better – it 25 makes a better set of information so that you</p>	<p style="text-align: right;">Page 97</p> <p>1 employ one team to do research like this in the 2 past? 3 A. Yes. 4 Q. Why does – why does it cost roughly 5 \$2.8 million to monitor one individual with two 6 teams? 7 A. Based on what the client wanted. 8 Q. No, I'm saying why does it cost that 9 much; where did you come up with the \$2,805,000 10 cost? 11 MR. SCHMIDT: Objection, but go ahead. 12 A. That's an internal cost that Mike is 13 more aware of than I am. 14 Q. I appreciate that Mike might know more 15 than you. I'm just asking what you know. What 16 does Strategic Vision know about the cost it 17 quoted to the individuals at this meeting? 18 A. Because it depends upon the cost and 19 the risk and all of the dimensions that we have 20 to put together in order to retrieve the 21 information that the client was adamant about 22 having. 23 Q. So part of the cost is the risk of 24 getting exposed or – is that part of how the 25 cost is calculated?</p>

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<p style="text-align: right;">Page 98</p> <p>1 A. It is. But it's expensive.</p> <p>2 Q. And what – what about it is expensive?</p> <p>3 Are the teams expensive to –</p> <p>4 A. The teams are very expensive.</p> <p>5 Q. Let's go to 395. It says, "US-based</p> <p>6 online army - Same group as those who helped win</p> <p>7 Trump election." Do you see that?</p> <p>8 A. Um-hum. Yes.</p> <p>9 Q. Is that part of the investigatory</p> <p>10 research or is that a different online group?</p> <p>11 A. This would be the U.S. side.</p> <p>12 Q. What is the U.S. side? What does that</p> <p>13 mean?</p> <p>14 A. It would be the U.S. basic</p> <p>15 investigative dimension of social media and so</p> <p>16 forth.</p> <p>17 Q. So one of the teams would be U.S. –</p> <p>18 A. Credit reports; whatever is publicly</p> <p>19 and legally allowed in the United States for us</p> <p>20 to do, yes.</p> <p>21 Q. I see. So, in providing this</p> <p>22 investigatory service, Strategic Vision divides</p> <p>23 its team by where they're domiciled or headed?</p> <p>24 A. Who?</p> <p>25 Q. The team. So, in other words, you have</p>	<p style="text-align: right;">Page 100</p> <p>1 Russian opposition leaders and groups work,</p> <p>2 generally speaking?</p> <p>3 A. Our team would work with the opposition</p> <p>4 groups I've already discussed.</p> <p>5 Q. Oh, from the prior slide?</p> <p>6 A. Yes.</p> <p>7 Q. The prior slide being SV390, the</p> <p>8 picture of –</p> <p>9 A. Yes.</p> <p>10 Q. What would you exchange for support</p> <p>11 with – to Russian opposition groups?</p> <p>12 A. I don't understand that question.</p> <p>13 Q. It says in the document, "help fund</p> <p>14 Russian opposition groups in Siberia, Far East,</p> <p>15 Vladivostok in exchange for other support."</p> <p>16 A. Well, I think that's pretty clear.</p> <p>17 Q. Well, what would be exchanged?</p> <p>18 A. Information, pro-democracy. We were</p> <p>19 looking at pro-democracy issues and how to be</p> <p>20 more proactive to help pro – pro-democracy in</p> <p>21 Russia, as well as in China.</p> <p>22 Q. So the concept was that Russian</p> <p>23 opposition groups would exchange information with</p> <p>24 this cause for their mutual benefit?</p> <p>25 A. Ostensibly. But it wasn't something we</p>
<p style="text-align: right;">Page 99</p> <p>1 a U.S. team?</p> <p>2 A. Yes.</p> <p>3 Q. And you would also have a foreign team?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. Just for the benefit of the</p> <p>6 record. What's the purpose in separating the –</p> <p>7 having a U.S.-based team and a foreign-based</p> <p>8 team?</p> <p>9 A. Because we comply with U.S. law.</p> <p>10 Q. So, in other words, there's things that</p> <p>11 the foreign teams can do that the U.S.-based</p> <p>12 teams can't do?</p> <p>13 A. We understand that's correct, yes.</p> <p>14 Q. Okay. If you go to 398?</p> <p>15 A. Okay.</p> <p>16 Q. You see it says "Russian networking</p> <p>17 cost"?</p> <p>18 A. Yes.</p> <p>19 Q. And it says, "We will facilitate but</p> <p>20 not manage or coordinate networking with Russian</p> <p>21 opposition leaders and groups"?</p> <p>22 A. Yes.</p> <p>23 Q. The "we" there is Strategic Vision?</p> <p>24 A. Yes.</p> <p>25 Q. And how would that networking with</p>	<p style="text-align: right;">Page 101</p> <p>1 had agreed to, no.</p> <p>2 Q. Oh, so this didn't end up being part of</p> <p>3 the research agreement?</p> <p>4 A. This is not the contract.</p> <p>5 Q. I know that. I'm asking whether this</p> <p>6 service is part of the contract?</p> <p>7 A. This is not part of the contract.</p> <p>8 Q. Got it.</p> <p>9 A. If it had been, the cost would have</p> <p>10 been mega amounts.</p> <p>11 Q. So this is an expensive service, this</p> <p>12 Russian networking?</p> <p>13 A. Excuse me?</p> <p>14 Q. I said, so this Russian networking</p> <p>15 service is an expensive service?</p> <p>16 A. This was a preliminary estimate on –</p> <p>17 an overview of what we thought that we would like</p> <p>18 to do for Mr. Guo. Mr. Guo only wanted to do</p> <p>19 investigations on these 15 people in the United</p> <p>20 States and elsewhere, not on this entire thing</p> <p>21 that you're looking at.</p> <p>22 Q. Got you.</p> <p>23 A. Okay?</p> <p>24 Q. Turning to SVUS402. Do you see that?</p> <p>25 A. I do.</p>

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<p style="text-align: right;">Page 102</p> <p>1 Q. It says, "sign MOU." That's a 2 memorandum of understanding? 3 A. That's correct. 4 Q. Is that how Strategic Vision normally 5 contracts with its clients? 6 A. Again, this is a preliminary overview. 7 This was a discussion. We were discussing it 8 openly in a little meeting that we were having 9 with Mr. Guo. So this was just sort of a menu of 10 deciding what we would do and how we would 11 perform. 12 Q. Does Strategic Vision normally sign 13 written agreements with its clients? 14 A. Yes. 15 Q. Does Strategic Vision have a standard 16 contract that it uses for its client engagements? 17 A. No. 18 Q. So you don't have a stock agreement 19 that you normally use when – 20 A. No client's the same. 21 Q. So, prior to signing the research 22 agreement, did you tell Mr. Guo that you had an 23 in-house team of investigators at Strategic 24 Vision? 25 A. This is a fascinating misnomer.</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. What, if anything, did you tell Mr. Guo 2 about an Abu Dhabi princess? 3 A. A Saudi – it was not Abu Dhabi, it was 4 Saudi. 5 Q. Okay. What did you – 6 A. To clarify, it's usual we have to 7 clarify. 8 Q. Sure. What did you tell Mr. Guo about 9 a Saudi princess? 10 A. She was my roommate. 11 Q. That was in college? 12 A. No, in high school. 13 Q. And is she a client of Strategic 14 Vision? 15 A. No. 16 Q. Okay. Did you tell Mr. Guo that you 17 had, or that Strategic Vision had relationships 18 with clients in Saudi Arabia? 19 A. Yes. 20 Q. And in Iran? 21 A. Many years ago, in Iran. 22 Q. What about Turkey? 23 A. Not a client. A relationship. 24 Q. And what about Qatar, did you tell him 25 you had clients in Qatar?</p>
<p style="text-align: right;">Page 103</p> <p>1 Q. What – what term is that that you're 2 calling – 3 A. No. 4 Q. – a misnomer? 5 A. No. 6 MR. SCHMIDT: Just answer the question. 7 A. No. 8 MR. SCHMIDT: Let him follow – he'll 9 follow up if he wants to follow up. 10 Q. Okay. So Strategic Vision does not 11 have an in-house team of investigators? 12 A. No. 13 Q. And you never told Mr. Guo that you had 14 20 employees, did you? 15 A. I said that we worked with a team of 16 people. I did not say that we had 20 employees. 17 Q. Okay. Did you ever tell him that you 18 had strong teams in Europe and the Middle East? 19 A. Most likely, yes. 20 Q. Again, this is all before signing the 21 research agreement, right? 22 A. Yes. 23 Q. And did you tell him you had 24 relationships with an Abu Dhabi princess? 25 A. I said a – no.</p>	<p style="text-align: right;">Page 105</p> <p>1 A. I did. Past tense. We don't work with 2 terrorists. 3 Q. Okay. What about Republican 4 politicians, did you ever tell Mr. Guo that you 5 worked for Republican politicians? 6 A. Many. 7 Q. So you told him you had – that 8 Strategic Vision had worked for – 9 MR. SCHMIDT: Just focus in on what you 10 told him. 11 A. Yes. I did, yes. 12 Q. So you told Mr. Guo that you had 13 provided services to – that Strategic Vision had 14 provided services to Republican – 15 A. Personally. 16 Q. – politicians? 17 A. Personally. Not Strategic Vision. 18 Q. Okay. And what did that entail; that 19 was political campaigns or – 20 A. Political campaigns. 21 Q. And I'm going to guess those were 22 Republican – 23 A. Republican. 24 Q. – politicians? 25 A. Yes, presidential.</p>

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<p style="text-align: right;">Page 106</p> <p>1 Q. Which president, or nominee?</p> <p>2 A. Beginning – it's okay, it's on the</p> <p>3 record. Beginning with the campaign for</p> <p>4 President Reagan, President Bush, Dan Quayle,</p> <p>5 obviously President Trump.</p> <p>6 Q. Did you tell Mr. Guo about all of these</p> <p>7 or some of them?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 A. He asked.</p> <p>11 Q. Did you tell him that you had influence</p> <p>12 at the CIA?</p> <p>13 MR. SCHMIDT: Objection, but go ahead.</p> <p>14 A. I never would have used the word</p> <p>15 influence.</p> <p>16 Q. How would you put it?</p> <p>17 A. Channels.</p> <p>18 Q. In other words, you have contacts at</p> <p>19 the CIA?</p> <p>20 A. Yes.</p> <p>21 Q. And you could get information from them</p> <p>22 that could be useful to a client from the CIA?</p> <p>23 A. No. That's a trick question.</p> <p>24 Q. No, I'm not trying to trick you. I</p> <p>25 didn't – if it came out that way, it wasn't my</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. I'm just trying to –</p> <p>2 A. There were a lot of drafts running</p> <p>3 around at the time, so, and the date is not</p> <p>4 right.</p> <p>5 Q. When did you first start drafting an</p> <p>6 agreement in connection with this case?</p> <p>7 A. When he asked us to, probably in –</p> <p>8 around the 15th or so of December of 2017, after</p> <p>9 several meetings.</p> <p>10 Q. Were there any other meetings, other</p> <p>11 than the three we've talked about already, that</p> <p>12 preceded this drafting?</p> <p>13 A. You know, you'd have to ask Mike. I</p> <p>14 don't think so, no.</p> <p>15 Q. When did you – when did you do the</p> <p>16 first draft? Don't even worry about this</p> <p>17 document. I don't know if it is the first draft.</p> <p>18 A. When we had the vision documents, those</p> <p>19 were sort of the beginning of the discussion.</p> <p>20 This time to get them was also part of the vision</p> <p>21 document that was on the flash drive, and it was</p> <p>22 all in the conversation of trying to understand</p> <p>23 what it was that Guo wanted.</p> <p>24 Q. So how did you go about doing the first</p> <p>25 draft? Did you and Mike sit down at a computer</p>
<p style="text-align: right;">Page 107</p> <p>1 intent.</p> <p>2 A. Yeah, come on.</p> <p>3 Q. I'm trying to understand what your</p> <p>4 channels to the CIA, what their use is?</p> <p>5 A. Information sources that are</p> <p>6 unclassified.</p> <p>7 Q. And I would ask you the same question.</p> <p>8 Did you tell him that you had contacts or</p> <p>9 channels in the state department?</p> <p>10 A. Yes.</p> <p>11 Q. Did you ever tell him that you worked</p> <p>12 for the CIA?</p> <p>13 A. Never.</p> <p>14 Q. Okay. Did you ever tell him that</p> <p>15 Mr. Waller worked for the CIA?</p> <p>16 A. Never.</p> <p>17 MR. GRENDI: Let's go to 8.</p> <p>18 (Wallop Exhibit 8, Research Agreement,</p> <p>19 January 1, 2018, marked for identification.)</p> <p>20 Q. This has been marked Wallop 8. Do you</p> <p>21 recognize this document at all?</p> <p>22 A. This was a draft document to – to Guo</p> <p>23 initially.</p> <p>24 Q. Who created it?</p> <p>25 A. I think Mike and I did.</p>	<p style="text-align: right;">Page 109</p> <p>1 together, or what was the process?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Where was that, at your home in</p> <p>4 Virginia?</p> <p>5 A. Yes.</p> <p>6 Q. And you sat together and –</p> <p>7 A. Yes.</p> <p>8 Q. – typed it out or –</p> <p>9 A. Sat together and discussed it and...</p> <p>10 Q. Did you – was it handwritten notes</p> <p>11 that you later had someone transcribe or did</p> <p>12 you –</p> <p>13 A. No.</p> <p>14 Q. – type it on the computer?</p> <p>15 A. No. We just typed it up while we were</p> <p>16 talking.</p> <p>17 Q. And did you do the typing or did he?</p> <p>18 A. He did the typing.</p> <p>19 Q. Okay. And did you keep the original</p> <p>20 draft that you created?</p> <p>21 A. I think this was the draft. I don't</p> <p>22 know.</p> <p>23 Q. Okay. And do you recall giving Wallop</p> <p>24 8 to Mr. Guo or Lianchao or Ms. Wang?</p> <p>25 A. I'm sure that we gave it to both of</p>

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<p style="text-align: right;">Page 110</p> <p>1 them. But we would have given it to them, we</p> <p>2 would never have emailed it.</p> <p>3 Q. And why is that?</p> <p>4 A. Because of security and open internet.</p> <p>5 We did everything very carefully, even before we</p> <p>6 had a contract.</p> <p>7 Q. So even if it was like a Signal message</p> <p>8 and end to end encrypted, you wouldn't send it?</p> <p>9 A. Well, Signal was different. Signal was</p> <p>10 a little different.</p> <p>11 Q. Why is that?</p> <p>12 A. Well, it's not as porous as a lot of</p> <p>13 them are.</p> <p>14 Q. So you wouldn't have a problem sending</p> <p>15 this agreement via Signal?</p> <p>16 A. I honestly can't remember.</p> <p>17 Q. No, I'm asking –</p> <p>18 A. I don't – I normally would not have.</p> <p>19 Q. Okay.</p> <p>20 A. I personally would not have.</p> <p>21 Q. I see.</p> <p>22 A. I don't send anything, if I can help</p> <p>23 it, on Signal or anything else. I either</p> <p>24 hand-deliver it or I USB it.</p> <p>25 Q. And when did you first give a draft to</p>	<p style="text-align: right;">Page 112</p> <p>1 sort of one of the final drafts.</p> <p>2 Q. I see. But – so there were other</p> <p>3 drafts that you had that you deleted?</p> <p>4 A. Probably.</p> <p>5 Q. Okay. And why is that, why don't you</p> <p>6 keep the drafts of the agreements that you do in</p> <p>7 connection with engaging a client?</p> <p>8 A. Because there are typos and there are</p> <p>9 linguistic changes that need to be made in a</p> <p>10 better – in a better draft. I don't understand</p> <p>11 that.</p> <p>12 Q. I appreciate that one wouldn't be used</p> <p>13 going forward. I'm talking about the deletion</p> <p>14 process. Why is it that you would dispose of</p> <p>15 them?</p> <p>16 A. Well, why would you keep –</p> <p>17 MR. SCHMIDT: Just answer the question.</p> <p>18 A. No. I don't know the answer.</p> <p>19 Q. So you don't know whether you deleted</p> <p>20 draft versions of the agreement or not?</p> <p>21 A. I produced everything that we have in</p> <p>22 the way of whatever draft agreements. I have</p> <p>23 nothing else in the way of draft agreements.</p> <p>24 Q. So Strategic Vision has no other drafts</p> <p>25 of the agreement?</p>
<p style="text-align: right;">Page 111</p> <p>1 Mr. Guo or Lianchao Han or Yvette Wang?</p> <p>2 A. It would have been towards the middle</p> <p>3 to end of December. It was the middle of</p> <p>4 December, I think initially, and then we kept</p> <p>5 hammering it out, hammering it out, and hammering</p> <p>6 it out until we had a final agreement which was</p> <p>7 signed on the, whatever it was, the 6th of</p> <p>8 January.</p> <p>9 Q. And without revealing any</p> <p>10 communications, did Strategic Vision involve an</p> <p>11 attorney in drafting this research agreement?</p> <p>12 A. No. We just did it by trust.</p> <p>13 Q. I think you said it before, but</p> <p>14 Strategic Vision has never used an agreement</p> <p>15 similar to this to service another client?</p> <p>16 A. No.</p> <p>17 Q. And did you keep the drafts of this</p> <p>18 research agreement that you – the multiple</p> <p>19 drafts you referenced before?</p> <p>20 A. What you see is what you have.</p> <p>21 Q. I know. What I'm saying is, you had</p> <p>22 referred to there were multiple drafts, correct?</p> <p>23 A. There were, but then – you know, with</p> <p>24 a draft, you go through, you delete it, you –</p> <p>25 you create a better draft. So I think this was</p>	<p style="text-align: right;">Page 113</p> <p>1 A. Not that I'm aware of.</p> <p>2 Q. Okay. It has a blank for contractor.</p> <p>3 Any particular reason that –</p> <p>4 A. No. That would have been Strategic</p> <p>5 Vision and the client.</p> <p>6 Q. Did you consider using another entity</p> <p>7 to be the contractor in connection with this</p> <p>8 research?</p> <p>9 A. No.</p> <p>10 Q. What's Strategic Vision's financial</p> <p>11 relationship with Mr. Waller in connection with</p> <p>12 this research agreement?</p> <p>13 A. You mean how did we – how did we –</p> <p>14 how did we compensate him; is that what you're</p> <p>15 asking?</p> <p>16 Q. If that's – yeah, if that – that's</p> <p>17 certainly encompassed by what I just said.</p> <p>18 A. Otherwise, I don't understand the</p> <p>19 question.</p> <p>20 Q. Sure. What did – how was Mr. Waller</p> <p>21 paid for his services in connection with the</p> <p>22 research agreement?</p> <p>23 A. By wire.</p> <p>24 Q. Okay. And how was that calculated or</p> <p>25 determined?</p>

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<p style="text-align: right;">Page 114</p> <p>1 A. We just had an agreement of trust 2 between us. 3 Q. What were the terms of that agreement? 4 A. Probably 50/50, plus expenses. 5 Q. And I take it this wasn't a written 6 agreement? 7 A. No. We never needed one. 8 Q. Right. So when did you and – well, 9 when did Strategic Vision and Mr. Waller come to 10 this 50/50 split agreement? 11 A. Well, after we had the agreement 12 finally signed, it had been going off and on, off 13 and on during all of December, we didn't know 14 whether we had an agreement or not. And then, 15 when Yvette turned up with the first set of flash 16 drives that were corrupted, so then I had come to 17 New York – we didn't have an agreement, per se. 18 We had a signed agreement. We had no funds at 19 the time, at the first – at the tail end of 20 December, when we were still all talking after 21 Christmas. 22 And, finally, the funds turned up – 23 I'm trying to answer your question here. When 24 the funds turned up in, like, the 2nd or 3rd of 25 January of 2018, we still didn't know whether</p>	<p style="text-align: right;">Page 116</p> <p>1 the wire that was sent? 2 A. The wire was not sent until the middle 3 of January or so. 4 Q. Okay. And was that wire for splitting 5 the profits or for something else? 6 A. It was for beginning to start paying 7 the team as well as beginning to pay Mike. 8 Q. Oh, so it was both? 9 A. Yeah. There were two wires. Maybe 10 there were three wires, yeah. 11 Q. So how much was the wire for the team? 12 And I assume that means Team 1? 13 A. The preliminary amount for Team 1 was 14 at least 300,000. 15 Q. And how much of that, if there was a 16 second wire or the same wire, was for Dr. Waller? 17 A. Then there was a separate wire for 18 about 200 for Dr. Waller. It could have been 19 250, I have to look. We haven't done our tax 20 thing yet on it. But about 250. And then there 21 was an additional amount for expenses. 22 Q. How much was that expense amount wire, 23 if you recall? 24 A. Well, I think – we're talking about 25 travel, and – because he had to do a lot of the</p>
<p style="text-align: right;">Page 115</p> <p>1 that was even going to work, and then they turned 2 up from somebody we'd never heard of, and so 3 forth and so on. So we had to sit down and 4 decide what was going to go for the teams that we 5 were going to use and how we were going to 6 allocate the expenses and so forth. 7 Q. So when – when was the point in time 8 when Strategic Vision and Mr. Waller decided how 9 they were going to, as you described it, split 10 the – split it 50/50? 11 A. Not until sometime in January. 12 Probably the end of January. 13 Q. So, well after the contract had been 14 signed – 15 A. Yes. 16 Q. – and the – 17 A. We were trying to figure out what 18 things were going to cost. 19 Q. You said before that Strategic Vision 20 had sent money to Mr. Waller, or Dr. Waller? 21 A. When? 22 Q. I'm asking. That's what my question 23 is. 24 A. No. I mean... 25 Q. You said there was a wire. What was</p>	<p style="text-align: right;">Page 117</p> <p>1 face-to-face collection, and last minute, which 2 costs a lot more; probably between 25 and 50, I 3 can't remember, thousand. 4 Q. And is that the full extent of the 5 amount of money that's been paid to Dr. Waller in 6 connection with the research agreement that's the 7 subject of this litigation? 8 A. I think there was a bit more, maybe 9 another 50, and that was based on certain 10 invoices that he had for – for things that he 11 was – that we had to pay. 12 Q. I see. And so what about – let's just 13 set aside Dr. Waller. Were there any other costs 14 that Strategic Vision incurred in connection with 15 this research agreement that didn't go through 16 Dr. Waller or one of his entities? 17 A. There were – there was a lot of travel 18 expense for Strategic Vision, face-to-face time 19 with these individuals overseas that I had to do. 20 There was – there were other entities that were 21 also contracted to retrieve information. 22 Q. Let's go one at a time, I'm sorry to 23 hop in. But what were your – what were 24 Strategic Vision's kind of direct travel 25 expenses?</p>

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<p style="text-align: right;">Page 118</p> <p>1 A. Oh, I would say probably at least 2 50,000. 3 Q. And does Strategic Vision have records 4 and bank statements that would memorialize or 5 otherwise reflect all these payments you're 6 talking about here today? 7 A. We would be able to give you an idea as 8 to what the costs are, yes. 9 Q. So those records do exist? 10 A. The records, the receipts, yes. 11 (*r) MR. GRENDI: Joe, obviously we're going 12 to call for the production of those 13 documents, we'll obviously send you a 14 letter, but to put that on the record. 15 Q. I'm sorry, you were saying after travel 16 expenses, there were other costs as well? 17 A. Yes. 18 Q. What were those? 19 A. The hiring of individuals overseas to 20 retrieve certain information that was only – 21 only in the U.K. or in Switzerland or in the 22 Middle East. 23 Q. Okay. And these are – this is 24 separate from Team 1? 25 A. Yes.</p>	<p style="text-align: right;">Page 120</p> <p>1 travel, time spent working on this, lots of 2 different meetings with different people to try 3 to collect data. 4 Q. Did Strategic Vision ever turn away any 5 clients because of this engagement? 6 A. Yes, we did. 7 Q. When was that? 8 A. It was probably in March. 9 Q. Of what year? 10 A. I'm sorry. 11 Q. That's okay. 12 A. 2018. 13 Q. Sure. March of 2018. And why did 14 Strategic Vision turn that client away? 15 A. Because we were still working on this, 16 we believed. It could have been February, too. 17 I'd have to ask Mike. 18 Q. And what's the name of that potential 19 client? 20 A. I can't tell you. 21 Q. So you're refusing to tell me that 22 because? 23 A. I can't tell you. 24 Q. No, I'm asking why you're not telling 25 me?</p>
<p style="text-align: right;">Page 119</p> <p>1 Q. And what was the cost of, let's just 2 say, the team you used to get information out of 3 the U.K.? 4 A. It was about 20,000 U.S. dollars. 5 Q. Is that a group called Fletcher? 6 A. That's correct. 7 Q. Okay. What about, you said that maybe 8 a team in Switzerland or somewhere else? 9 A. Yes. 10 Q. What was the cost of that other team? 11 A. I'd have to look. I can't remember. 12 But it was minimal. I mean, it wasn't – it 13 wasn't – it's like maybe 8, \$10,000, something 14 like that. 15 Q. Right. 16 A. Some of it had to be done in cash. 17 Q. How much of it was done in cash? 18 A. Maybe that amount. 19 Q. Eight to 10,000? 20 A. Eight to 10,000, perhaps. I hate cash. 21 Q. If you would take a moment, are there 22 any other costs that you can think of that 23 Strategic Vision incurred because of this 24 research agreement? 25 A. Well, the usual costs, telephone,</p>	<p style="text-align: right;">Page 121</p> <p>1 A. It's confidential. 2 MR. SCHMIDT: Can you describe in 3 general terms at all or? 4 THE WITNESS: Obviously, I cannot. 5 MR. SCHMIDT: Okay. 6 MR. GRENDI: I mean, obviously, we 7 don't accept that assertion of 8 confidentiality here, and we'll deal with it 9 at a later date. 10 Q. So why was it that this confidential 11 client couldn't be engaged? 12 A. We had a lot on our plate. 13 Q. And how much was this potential client 14 willing to engage Strategic Vision for? 15 A. We hadn't gotten that far. 16 Q. So you don't know whether the – 17 A. No. 18 Q. – potential client was going to be a 19 valuable one or not? 20 A. No, I don't know. I'd have to – I'd 21 have to talk to Mike about it. 22 Q. Was it Mike's client or your client, or 23 Strategic Vision's client I should say? 24 A. We would have shared the client. 25 Q. Okay. And just generally, can you</p>

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<p style="text-align: right;">Page 122</p> <p>1 describe what the tenor of the conversation was</p> <p>2 with this client as to why you couldn't provide</p> <p>3 the service?</p> <p>4 A. We had a full plate. We couldn't</p> <p>5 handle it.</p> <p>6 Q. So the client reached out to you?</p> <p>7 A. Yes.</p> <p>8 Q. And you said, we can't do it, we're</p> <p>9 full?</p> <p>10 A. We're full.</p> <p>11 Q. So Strategic Vision can only have a</p> <p>12 limited amount of clients at a time?</p> <p>13 A. No.</p> <p>14 Q. What's full capacity for Strategic</p> <p>15 Vision? It sounds like one investigation,</p> <p>16 investigatory research project is a full plate?</p> <p>17 A. No.</p> <p>18 Q. It's not?</p> <p>19 A. No.</p> <p>20 Q. Okay. So, again I'll ask, why did you</p> <p>21 turn them away if you could have done it then?</p> <p>22 A. We had a full plate.</p> <p>23 Q. So the research agreement that is the</p> <p>24 subject of this case, that encompasses work that</p> <p>25 maxes out Strategic Vision's capacity?</p>	<p style="text-align: right;">Page 124</p> <p>1 free, we can do it?</p> <p>2 A. No, we did not. And we had a full</p> <p>3 plate, we should have.</p> <p>4 Q. Because of litigation?</p> <p>5 A. No. We had a full plate.</p> <p>6 Q. So you got another client? I'm asking</p> <p>7 a question.</p> <p>8 MR. SCHMIDT: I mean, can you give him</p> <p>9 just a little bit more about what the full</p> <p>10 plate is, in addition to the lawsuit and</p> <p>11 this contract. I think that's fair.</p> <p>12 A. We had a full plate. I can't give you</p> <p>13 any more than that.</p> <p>14 Q. So you're refusing to answer that</p> <p>15 question? You're refusing to tell me whether</p> <p>16 Strategic Vision had another client, and that's</p> <p>17 why you couldn't do any more?</p> <p>18 A. We could have had another client. We</p> <p>19 did not – we chose not to take the other client</p> <p>20 because we had a full plate. We didn't know what</p> <p>21 this whole thing was all about. So we just</p> <p>22 didn't want to get into any more issues with a</p> <p>23 client that was as complicated.</p> <p>24 Q. At the time the research agreement was</p> <p>25 signed, January 6, 2018 –</p>
<p style="text-align: right;">Page 123</p> <p>1 A. No.</p> <p>2 Q. Okay. So then it's not a full plate?</p> <p>3 A. We were very busy doing many other</p> <p>4 things, and so we could not take on an additional</p> <p>5 client at the time, even though we wanted to.</p> <p>6 But we'd also been served with some lawsuit on</p> <p>7 the 23rd of February, which then, who knows.</p> <p>8 Q. So just to be clear. So the client</p> <p>9 that was turned away from Strategic Vision –</p> <p>10 A. Yes.</p> <p>11 Q. – because of your full plate –</p> <p>12 A. Yes.</p> <p>13 Q. – was after the February 23rd, 2018</p> <p>14 letter?</p> <p>15 A. No. As I said, it was either during</p> <p>16 the middle of February, to the beginning of</p> <p>17 March. I can't remember exactly what the date</p> <p>18 was.</p> <p>19 Q. Okay.</p> <p>20 A. Mike is the one that would know what</p> <p>21 the date was. I don't know the date. But we had</p> <p>22 hoped that the client would understand the</p> <p>23 circumstances.</p> <p>24 Q. Did you go back to that client after</p> <p>25 this agreement was terminated and say, we're</p>	<p style="text-align: right;">Page 125</p> <p>1 A. Correct.</p> <p>2 Q. – was Strategic Vision servicing any</p> <p>3 other clients with investigatory research</p> <p>4 services?</p> <p>5 A. No.</p> <p>6 Q. From the signing of the research</p> <p>7 agreement, until February 23rd, 2018, did</p> <p>8 Strategic Vision provide investigatory research</p> <p>9 services to any other client?</p> <p>10 A. Not in that time frame, no.</p> <p>11 Q. Okay. After February 23rd, 2018</p> <p>12 through, let's say, the end of March 2018, did</p> <p>13 Strategic Vision provide investigatory research</p> <p>14 services to any other client?</p> <p>15 A. No.</p> <p>16 MR. GRENDI: How are people feeling</p> <p>17 about lunch and taking that break?</p> <p>18 MR. SCHMIDT: At one o'clock, do you</p> <p>19 want to do it?</p> <p>20 MR. GRENDI: Do you want to do</p> <p>21 one o'clock? I'm fine with that. Is that</p> <p>22 okay with you?</p> <p>23 MS. TESKE: Yes.</p> <p>24 MR. SCHMIDT: Is that good?</p> <p>25 THE WITNESS: That's fine.</p>

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<p style="text-align: right;">Page 126</p> <p>1 MR. GRENDI: So another 15 minutes. 2 Let's do Strategic Vision 9. 3 (Wallop Exhibit 9, Research Agreement 4 dated December 29, 2017, marked for 5 identification.) 6 Q. Ms. Wallop, do you recognize this 7 document? 8 A. I do. 9 Q. That's your signature on the last page 10 there? 11 A. It is. 12 Q. Were you physically present when this 13 contract was executed? 14 A. Yes. 15 Q. And who else was there? 16 A. Yvette Wang. 17 Q. Anyone else? 18 A. No. 19 Q. Dr. Waller wasn't physically present? 20 A. No. 21 Q. Was he on a conference call or 22 telephoned in during the time that this agreement 23 was signed? 24 A. No. 25 Q. The agreement references the laws of</p>	<p style="text-align: right;">Page 128</p> <p>1 as to how best to visualize, so to speak, the 2 whole concept of this agreement, we used an 3 example of like, it's like fish in a tank. So if 4 you put the ten fish, or, as it turned out to be, 5 15 fish in the tank, and one of the fish – 6 forgive me – died, but we didn't want to use the 7 word died, if one of the fish wasn't a useful 8 fish on the information that we were trying to 9 pull, we would take that fish out and put a new 10 fish, meaning a new name, into the tank, and we 11 would run the investigative background on that 12 new fish, as well as the other nine fish. 13 So, that's where the whole concept of 14 the fish tank came from. He loved it. He 15 couldn't wait to use it. It was a big deal to 16 him. So, fine, we kept talking about fish. So, 17 for whatever reason, that's why it ended up in 18 this sort of contract agreement. 19 I realize that it's not the usual kind 20 of contract terminology that I would have used, 21 but he loved it, and so we used it, and so he 22 understood it, and that's why we moved forward 23 with it 24 Q. I just want to know where the concept 25 came from. Did he start using the term fish or</p>
<p style="text-align: right;">Page 127</p> <p>1 the state of Nevada in that second paragraph, do 2 you see that? 3 A. Correct. 4 Q. Where did that come from? 5 A. Because Strategic Vision is registered 6 in the state of Nevada. 7 Q. So you put that in there because that's 8 where Strategic Vision is incorporated? 9 A. Correct. 10 Q. And there's some, I'll call it lingo or 11 jargon in this contract about fish, do you recall 12 that? 13 A. Yes. 14 Q. Where did the term fish come from? 15 A. Guo was having a hard time 16 understanding how – how we would select the – 17 the concept of investigation and the numbers, for 18 instance, per month. The – the whole file that 19 he showed us had – the original file, whatever 20 exhibit that was, in fact, had at least 92 names 21 in it, which was reduced down to 30 names, which 22 was then reduced down to the ten names, but then 23 they switched and wanted to have 15 names in the 24 first month. 25 So, in order to give him an explanation</p>	<p style="text-align: right;">Page 129</p> <p>1 did you; kind of like you saw a fish tank and you 2 said, well, it's just like if you took fish in 3 and out of a tank? 4 A. Well, we were talking in hypotheticals. 5 He didn't understand how we would have to just 6 take different names out of different sort of 7 collection points – 8 Q. I see. 9 A. – so we just used a really simple 10 analogy of a fish tank. And you put the ten fish 11 in, as it turned out for the first month 15, and 12 then they – you know, you pull one out if you 13 found that it wasn't going anywhere; in other 14 words, if it was a dead end. A lot of these 15 Chinese names used fake names. That's a whole 16 other thing we can get into. 17 Q. Sure. And has Strategic Vision ever 18 used this fish, or fish tank terminology – 19 A. Never. 20 Q. – in connection with – 21 Just let me finish my question. 22 A. Sorry. 23 Q. – with any other client? 24 A. Never. 25 Q. I take it from your expression that you</p>

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<p style="text-align: right;">Page 130</p> <p>1 found it silly or ridiculous?</p> <p>2 A. I did, but it helped him understand the</p> <p>3 concept.</p> <p>4 Q. It says here that, "Any and all</p> <p>5 materials provided by the client, that's Eastern</p> <p>6 Profit, to the contractor, that's Strategic</p> <p>7 Vision, will be treated with absolute</p> <p>8 confidentiality and will not be shared by the</p> <p>9 contractor with any other entity."</p> <p>10 Do you see that in the third paragraph</p> <p>11 of this research agreement?</p> <p>12 A. Yes.</p> <p>13 Q. What – how does that work with</p> <p>14 Strategic Vision in terms of sharing information</p> <p>15 with other entities?</p> <p>16 A. Well, we had to share it with the</p> <p>17 teams, in other words, for them to be able to do</p> <p>18 the research.</p> <p>19 Q. Does the contract discuss that at all?</p> <p>20 A. It's very clear. You can't have an</p> <p>21 agreement – you can't do the research unless you</p> <p>22 give it to the teams to do the research, right?</p> <p>23 Q. I just asked you if that was in the</p> <p>24 agreement?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 132</p> <p>1 high quality original research and prepare</p> <p>2 reports on subjects chosen at the client's</p> <p>3 discretion."</p> <p>4 Do you see that in that following</p> <p>5 sentence?</p> <p>6 A. Correct, yes.</p> <p>7 Q. What original research did Strategic</p> <p>8 Vision do in connection with this contract?</p> <p>9 A. Based upon what we received, we then</p> <p>10 started diving into pulling information.</p> <p>11 Q. When you say we, are you talking about</p> <p>12 the entity Strategic Vision or other people, like</p> <p>13 teams?</p> <p>14 A. Teams, and Mike and myself.</p> <p>15 Q. Was there anyone else that did the</p> <p>16 research, other than those three entities that</p> <p>17 you just referred to, yourself, Mr. Waller, or</p> <p>18 Dr. Waller, and the teams?</p> <p>19 A. The groups in – the individual ones in</p> <p>20 both Europe and in the U.K.</p> <p>21 Q. Is that, you mean Fletcher –</p> <p>22 A. Yes.</p> <p>23 Q. – and the other entity that you</p> <p>24 referred to –</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 131</p> <p>1 Q. Where?</p> <p>2 A. With any other entity. "Will not be</p> <p>3 shared by any other entity." It's not an empty,</p> <p>4 it was a team. An entity would be the Washington</p> <p>5 Post, or you, or a third or fourth party that has</p> <p>6 nothing to do with this research agreement.</p> <p>7 Q. So I just want to understand that. So</p> <p>8 then, the contractor referred to in the contract</p> <p>9 refers to more than just Strategic Vision?</p> <p>10 A. Our teams.</p> <p>11 Q. Okay.</p> <p>12 A. You understand the teams that we had to</p> <p>13 use.</p> <p>14 Q. I'm just trying to understand what the</p> <p>15 contract says. Does the contract say anything</p> <p>16 about teams?</p> <p>17 A. Well, if you're in the business, you</p> <p>18 understand teams are teams, and you have to use a</p> <p>19 team with a – as a part of the contract. He</p> <p>20 knew perfectly well what that meant.</p> <p>21 Q. I just asked you whether the contract</p> <p>22 said it, that's all.</p> <p>23 A. I'm not a lawyer. It wasn't drawn up</p> <p>24 by a lawyer.</p> <p>25 Q. It says, "The contractor will conduct</p>	<p style="text-align: right;">Page 133</p> <p>1 Q. – I guess, in Switzerland?</p> <p>2 A. Yes.</p> <p>3 Q. It says, "The contractor will produce</p> <p>4 complete research reports and provide all</p> <p>5 supporting data as indicated below." Do you see</p> <p>6 that, two or three sentences down?</p> <p>7 A. Yes.</p> <p>8 Q. So was Strategic Vision going to</p> <p>9 produce all the reports or were the teams going</p> <p>10 to create some of them?</p> <p>11 A. The teams were going to develop them on</p> <p>12 the flash drives. We were not going to do any</p> <p>13 written reports.</p> <p>14 Q. Why wouldn't you do any – why wouldn't</p> <p>15 Strategic Vision do any written reports?</p> <p>16 A. Because we were trying to keep it as</p> <p>17 secure as possible.</p> <p>18 Q. But you understood that the other</p> <p>19 teams – strike that. Let me start over.</p> <p>20 Strategic Vision understood that its teams would</p> <p>21 create written reports?</p> <p>22 MR. SCHMIDT: Objection.</p> <p>23 A. No.</p> <p>24 Q. No?</p> <p>25 A. No, it never says anything here about a</p>

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<p style="text-align: right;">Page 134</p> <p>1 written report.</p> <p>2 Q. No, I know, I understand that. I'm</p> <p>3 trying to understand whether Strategic Vision</p> <p>4 understood whether its teams or independent</p> <p>5 contractors would produce written reports?</p> <p>6 A. We would not produce written reports,</p> <p>7 or we had no intention of doing that. This</p> <p>8 was – these were face-to-face meetings,</p> <p>9 face-to-face information, USB flash drives.</p> <p>10 Q. Oh, I understand.</p> <p>11 A. It was –</p> <p>12 Q. Maybe we're having a semantic –</p> <p>13 A. It was Guo's – sorry. It was Guo's</p> <p>14 insistence on the security measure.</p> <p>15 Q. I want to clarify something here. Do</p> <p>16 you understand written to mean just like</p> <p>17 something written on a piece of paper as opposed</p> <p>18 to electronic?</p> <p>19 MR. SCHMIDT: That's how I understood</p> <p>20 it.</p> <p>21 A. Yes.</p> <p>22 MR. SCHMIDT: That's how the question</p> <p>23 was. You went from flash drives to USBs –</p> <p>24 MR. GRENDI: No, hold on. Hold on.</p> <p>25 MR. SCHMIDT: – into written reports.</p>	<p style="text-align: right;">Page 136</p> <p>1 confused. I don't know what you're asking.</p> <p>2 MR. GRENDI: All right. I mean –</p> <p>3 MR. SCHMIDT: I think you got to back</p> <p>4 way up and start this over.</p> <p>5 MR. GRENDI: Well, we're getting – why</p> <p>6 don't we do lunch. We'll start over on</p> <p>7 this. It's no big deal.</p> <p>8 THE VIDEOGRAPHER: Off the record at</p> <p>9 12:57.</p> <p>10 (Whereupon, a short recess was taken.)</p> <p>11 THE VIDEOGRAPHER: Back on the record</p> <p>12 at 1:01.</p> <p>13 Q. How did Strategic Vision intend to</p> <p>14 deliver the reports described in this research</p> <p>15 agreement?</p> <p>16 A. Directly to the designated driver, the</p> <p>17 designated agent for Mr. Guo, who was either</p> <p>18 going to be Lianchao, then it became Yvette, and</p> <p>19 then it became Lianchao again. So we would give</p> <p>20 it to them or Guo directly on a USB key.</p> <p>21 Q. So there would be electronic documents</p> <p>22 on a USB?</p> <p>23 A. Correct.</p> <p>24 Q. And would any of those documents be a</p> <p>25 report in narrative form?</p>
<p style="text-align: right;">Page 135</p> <p>1 So a written report is a written report. It</p> <p>2 has a standard connotation. So you might</p> <p>3 have to redo this.</p> <p>4 MR. GRENDI: Yeah, let's – let's break</p> <p>5 it out. I didn't get it. I always think of</p> <p>6 writing as both.</p> <p>7 Q. So, including electronic documents, did</p> <p>8 you understand that written materials would be</p> <p>9 produced?</p> <p>10 A. No.</p> <p>11 Q. So you never – Strategic Vision never</p> <p>12 contemplated providing any written materials to</p> <p>13 Eastern Profit?</p> <p>14 A. Correct.</p> <p>15 Q. So Strategic Vision understood</p> <p>16 everything would be conveyed orally to the</p> <p>17 client?</p> <p>18 A. Via flash drive.</p> <p>19 Q. So flash drive would be allowed.</p> <p>20 That's – I'm including a flash drive as a</p> <p>21 writing. In other words, if something is typed</p> <p>22 or handwritten on a piece of paper, that's a</p> <p>23 writing. Can we agree on that?</p> <p>24 A. No.</p> <p>25 MR. SCHMIDT: I'm actually seriously</p>	<p style="text-align: right;">Page 137</p> <p>1 A. I never saw them until later, until</p> <p>2 after all of this started. I never saw any of</p> <p>3 the documentation. Again, compartmentalizing.</p> <p>4 Q. Right. So Strategic Vision never</p> <p>5 reviewed any of the documents that were delivered</p> <p>6 to either Lianchao Han or Yvette Wang under this</p> <p>7 research agreement?</p> <p>8 MR. SCHMIDT: Objection. Go ahead.</p> <p>9 A. No.</p> <p>10 Q. And I'll just ask about you personally.</p> <p>11 You personally didn't review any of the documents</p> <p>12 that were delivered to Lianchao Han or Yvette</p> <p>13 Wang under this research agreement?</p> <p>14 A. No, because of the timing and the</p> <p>15 logistics.</p> <p>16 Q. Okay. What is financial forensic</p> <p>17 historical research?</p> <p>18 A. What do you mean?</p> <p>19 Q. Well, it's described here in – on</p> <p>20 Eastern 5, on the first page there?</p> <p>21 A. Yes.</p> <p>22 Q. Have you used that term before in –</p> <p>23 A. Yes.</p> <p>24 Q. – other research agreements?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 138</p> <p>1 Q. And are these kind of standard terms or 2 items that would be included in financial 3 forensic historical research? 4 A. It would be, particularly if you're 5 looking at information you're trying to get in 6 the way of money laundering or cash purchases; 7 for instance, there were cash purchases of 8 houses, cash purchases by these fish. We were 9 tracking their individual financial spending 10 habits, how they could have a house, how they 11 could have a car, when they only had \$2,500 in a 12 credit card limit. 13 I mean, there were multiple layers and 14 levels of investigation that go on into 15 financial, forensic accounting, or research in 16 this case. 17 Q. This kind of list of different things 18 that could be researched, including statements, 19 capital sources, etc., do you see that list with 20 all those commas there? 21 A. Yes. 22 Q. Was that a list that you and Dr. Waller 23 put together in terms of Strategic Vision's 24 capabilities? 25 A. What we would have been able to have</p>	<p style="text-align: right;">Page 140</p> <p>1 to our detriment; we said, it was not legal to do 2 what he wanted to be done, so. 3 Q. So in terms of the – you understood 4 that the client wanted everything in terms of 5 financial forensic historical research? 6 A. That's correct. 7 Q. And then you kind of put together this 8 list here of everything you could think of that 9 you could access? 10 A. We put together the list first. 11 Q. Okay. 12 A. And then he kept saying he wanted more 13 and more and more and more. 14 Q. Oh, so do you recall adding, you know, 15 different items to this A tab, forensic 16 historical research, to include more items that 17 he was demanding? 18 A. No. He demanded it verbally. 19 Q. Okay. 20 A. I think it was around the 26th of 21 January, that, I do remember, where he was 22 insistent; I don't care what it takes, get it, 23 get it. We said, you have to take your time. 24 Q. And it talks about on the next page, 25 Eastern 6, progress reports. It says,</p>
<p style="text-align: right;">Page 139</p> <p>1 researched – there are two ways of looking at 2 it. Stateside, what anybody can do that is into 3 this field. 4 Q. Right. 5 A. Versus what you can also do overseas, 6 and they're sort of two different rabbits here. 7 Q. Does the agreement kind of break out 8 that difference in terms of U.S. versus foreign? 9 A. Somewhere in here, I think it might 10 have. 11 Q. Okay. But just going back to this list 12 of different types of information on Eastern 5. 13 Do you recall you and Dr. Waller putting that 14 list together, or this – 15 A. Yes, we did. We talked about it, and 16 he wrote – wrote it while we collaborated on it. 17 Q. Do you remember any input from the 18 other side as to what the financial forensic 19 historical research should include? 20 A. They wanted everything, everything we 21 could get our hands on. 22 Q. I see. 23 A. He was particularly – Guo was 24 particularly insistent that we dive and dive 25 harder, and dive faster, and dive harder, almost</p>	<p style="text-align: right;">Page 141</p> <p>1 "contractor will produce a progress report on" – 2 A. Where is this? 3 Q. It's the, I guess, the first full 4 paragraph on Eastern 6. 5 A. Oh, okay. 6 Q. What is a progress report? 7 A. Verbal conversations that we had with 8 him. 9 Q. What would be in a verbal progress 10 report? 11 A. Telling him what we were doing and how 12 we were trying to get the teams set up and done 13 in the first month. 14 Q. Has Strategic Vision bargained for 15 progress reports in other agreements with other 16 clients? 17 A. I don't understand the question. Each 18 client is different and each agreement is 19 different, and so the terms are different. 20 Q. So you've never – strike that. Has 21 Strategic Vision ever provided progress reports 22 to other clients in connection with investigatory 23 research? 24 A. Usually we do it the same way, through 25 USB key or face-to-face.</p>

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<p style="text-align: right;">Page 142</p> <p>1 Q. Has the term progress report been used</p> <p>2 by Strategic Vision in other contracts it has</p> <p>3 with its clients?</p> <p>4 A. It depends on the terms of the</p> <p>5 contract.</p> <p>6 Q. I'm asking if you recall?</p> <p>7 A. I don't recall.</p> <p>8 Q. So progress reports are not a standard</p> <p>9 term that Strategic Vision uses in other research</p> <p>10 agreements?</p> <p>11 MR. SCHMIDT: Objection.</p> <p>12 A. Progress reports have different</p> <p>13 definitions depending upon the security and</p> <p>14 the – each individual client's situation. They</p> <p>15 are not all the same.</p> <p>16 Q. I understand.</p> <p>17 A. So they're not all the same.</p> <p>18 Q. Okay.</p> <p>19 A. A progress report – if somebody wants</p> <p>20 a progress report on how their cat is doing, we</p> <p>21 can do a progress report on how the cat is, or</p> <p>22 how a house is, or a real estate is. But this is</p> <p>23 highly confidential and a secure confidential</p> <p>24 compartmentalization of information that was</p> <p>25 vital to him, to Guo.</p>	<p style="text-align: right;">Page 144</p> <p>1 a progress report and a preliminary report?</p> <p>2 A. I have no idea how to answer that,</p> <p>3 except that I'm trying to explain to you that it</p> <p>4 is, in fact, a face-to-face conversation. It is</p> <p>5 not in writing.</p> <p>6 Q. I understand that.</p> <p>7 A. Okay. So what's the problem on the</p> <p>8 question? I don't understand.</p> <p>9 Q. I want to understand what the</p> <p>10 difference is between them.</p> <p>11 A. A written report and a verbal report?</p> <p>12 Q. Not a written report, no. Let me ask</p> <p>13 my question. It says, a weekly progress</p> <p>14 report –</p> <p>15 A. Yes.</p> <p>16 Q. – and one preliminary report at the</p> <p>17 end of the first month, or in the first month.</p> <p>18 A. All right.</p> <p>19 Q. And I want to know if, to Strategic</p> <p>20 Vision, is there a difference between the</p> <p>21 contents of a progress report and a preliminary</p> <p>22 report. I'm talking about contents, not delivery</p> <p>23 method.</p> <p>24 A. Depending upon how much we've been able</p> <p>25 to gather, the preliminary report is precisely</p>
<p style="text-align: right;">Page 143</p> <p>1 Q. What about preliminary reports?</p> <p>2 A. There is no terminology on here on</p> <p>3 preliminary reports, other than face-to-face.</p> <p>4 That's what we were relying on, was face-to-face.</p> <p>5 Q. If you look at the next sentence, it</p> <p>6 says – or, actually, the same sentence. It</p> <p>7 says, "the contractor will produce a progress</p> <p>8 report on this financial, forensic research each</p> <p>9 week in the first month." Then it says, "one</p> <p>10 preliminary report in the first month."</p> <p>11 A. Which we did. We exceeded that.</p> <p>12 Q. Let me ask you this. What does a</p> <p>13 preliminary report include?</p> <p>14 A. Verbal report, face-to-face, which is</p> <p>15 what we were doing when we had the meetings with</p> <p>16 Guo in his apartment.</p> <p>17 Q. I think you're misunderstanding my</p> <p>18 question. I'm trying to understand what the</p> <p>19 contents of a preliminary report would be, as</p> <p>20 compared to a progress report?</p> <p>21 A. It would be a verbal report and</p> <p>22 updating him on what the circumstances were and</p> <p>23 what we were gathering and how we were gathering</p> <p>24 it. That's a preliminary report.</p> <p>25 Q. So there's really no difference between</p>	<p style="text-align: right;">Page 145</p> <p>1 that; that's just the beginning, that's like the</p> <p>2 first paragraph in a novel. The next</p> <p>3 conversation, which is what happened, the next</p> <p>4 conversation was an update on the material and</p> <p>5 the information that we had already gathered. So</p> <p>6 it was all still verbal, face-to-face. There is</p> <p>7 no written report.</p> <p>8 Q. And what about a historical research</p> <p>9 report, one comprehensive historical research</p> <p>10 report; what were the contents –</p> <p>11 A. And that was –</p> <p>12 Q. – whether it's conveyed orally or in</p> <p>13 writing or electronically, what would the</p> <p>14 contents of a comprehensive historical research</p> <p>15 report be?</p> <p>16 A. That would have been the findings that</p> <p>17 would have been coming from our teams, or team in</p> <p>18 this case, which would have been the USB or flash</p> <p>19 drive.</p> <p>20 Q. And what would typically be in a</p> <p>21 comprehensive historical research report? What</p> <p>22 kind of level of information would be there?</p> <p>23 A. Since we were trying to get something</p> <p>24 within ten days of the contract commencing, and</p> <p>25 he was adamant about getting something</p>

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<p style="text-align: right;">Page 146</p> <p>1 immediately, and we had to move teams, and Mike 2 had to go and see the teams two or three times in 3 order to get – or meet with the team people two 4 or three times in order to get the flash drives, 5 it disrupted the process, and those teams were 6 doing a great deal of diving, and they did not 7 need to be disrupted. 8 So when we had the opportunity of 9 bringing information back, which is what Mike did 10 to Yvette several times, and we – that was the 11 content, that was the first set of contents 12 within the first ten days of the contract. 13 Q. Which delivery of the USB does 14 Strategic Vision consider to be the comprehensive 15 historical research report? 16 A. Well, the beginning of it was the – at 17 the tail end of January, I think, when Mike went 18 back and forth to – twice, I think, to – to 19 meet the team person. 20 Q. So was that about on January 30, 2019? 21 A. That's correct. Not '19. '18. 22 Q. Oh, '18. Thank you. Appreciate that. 23 Was that a meeting where Dr. Waller delivered, 24 let's say, an 80-Gigabyte Flash Drive to Yvette 25 Wang at the Tracks Bar?</p>	<p style="text-align: right;">Page 148</p> <p>1 activity with – like American Express or 2 airlines. It depends. Names of carriers, 3 manifests, geo location, which is easy enough 4 to – to get into if you have somebody's 5 telephone number. Major events. You can – you 6 can – you can do a lot that is – that is 7 accessed remotely, as it says here. 8 Q. And the reports for current tracking 9 research, is there any sort of meaningful 10 distinction between current tracking research 11 reports and financial, forensic, historical 12 research reports? 13 A. It all would have been delivered, had 14 we had time to collect what we wanted to collect, 15 within the first USB keys. 16 Q. Did Strategic Vision deliver any 17 current tracking research reports? 18 A. I don't know what was on the reports. 19 I think the answer is yes. 20 Q. But you never reviewed the reports? 21 A. I did not, but I understand that the 22 answer is – in some cases, actually, with the 23 Team 2 we did find stuff on tracking. 24 Q. Okay. We'll get to that. What about 25 social media research; in terms of investigatory</p>
<p style="text-align: right;">Page 147</p> <p>1 A. Well, at the train station. 2 Q. The train station, sure. 3 A. That's what I knew. Yes. 4 Q. But Strategic Vision had never even 5 reviewed – 6 A. I never saw it. 7 Q. – that deliverable? 8 A. Never saw it. How could I see it? 9 Q. And just looking at the next item, 10 "Current Tracking Research." 11 A. Yes. 12 Q. What kind of research is this? 13 A. It's current tracking research. 14 Q. What does it entail, though? It's like 15 a – is this – 16 A. It's tracking individuals. It's 17 tracking individuals that were the first ten on 18 the list, or the first 15 on the list that he 19 wanted us to track. 20 Q. Is this akin to what, like, a private 21 investigator would do in terms of – 22 A. Well, you know, you can look at 23 their – their travel habits, you can look at 24 their travel bills, you can probably maybe or 25 maybe not get into some of their credit card</p>	<p style="text-align: right;">Page 149</p> <p>1 research, what's the distinction between current 2 tracking and social media? 3 A. Social media is what's available online 4 that you can dive into and do a little bit more 5 in depth access into passwords and things like 6 that, that people like that, that do that sort of 7 thing understand how to get. 8 Q. Is that hacking, password hacking? 9 A. Overseas, it is known as hacking. We 10 would not hack here. 11 Q. But Strategic Vision would retain 12 independent contractors or other entities to do 13 hacking in other countries? 14 A. Yes. It's legal. 15 Q. Which countries is it legal in, if you 16 know? 17 A. I don't know all the countries. 18 Q. What are some of them? 19 A. Probably anywhere in Europe, probably 20 Russia, Eastern Europe, God knows Asia. 21 MR. SCHMIDT: Don't speculate. Just if 22 you know. 23 Q. Did Strategic Vision retain anyone to 24 do this social media research in connection with 25 this research agreement?</p>

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<p style="text-align: right;">Page 150</p> <p>1 A. It was all done with Team 1. Team 1 2 was doing it. 3 Q. So Team 1 was assigned the A, B and C 4 described here on Eastern 5 and 6? 5 A. They were assigned the entire menu. 6 That was their job. Even though it was separated 7 out, they knew exactly what their mandate was. 8 Q. And the social media research reports, 9 again, is there any distinction between how 10 they're created and the other reports, 11 conceptually? 12 A. We didn't have time. We – what we 13 were pulling in ten days was remarkable. Nobody 14 can pull it in ten days. So you have a 15 three-month contract that you're signed on to, 16 and you believe that you've got three months to 17 pull the entire set of information retrieval 18 that's necessary, and you're given ten days, 19 while somebody's squawking about, oh, my, you 20 know, it – it's not all there. 21 Well, it can't possibly be all there. 22 Nobody can have it there in ten days. You can't 23 build a team, collect the beginnings of all of 24 these things, unless you want to be shut down 25 immediately.</p>	<p style="text-align: right;">Page 152</p> <p>1 context? 2 A. All the information we were mandated to 3 investigate. 4 Q. And why USB only; was that a Strategic 5 Vision concept or Mr. Guo or someone else? 6 A. It was Guo, as well as our own sense of 7 security on this investigation. We were 8 investigating, according to Guo, a number of the 9 communist Chinese hierarchy leadership and their 10 children in the United States, and it was – 11 could have been life-threatening for all of us. 12 So it was only on USB key, and, hence, the 13 security issue. 14 Q. Did Strategic Vision understand that 15 all the fish in Exhibit 7 were living in the U.S. 16 or had property in the U.S.? 17 A. Some of – no. Some of them did and 18 some of them didn't. I – you know, you'd have 19 to go through them individually to see which ones 20 have what. 21 Q. And so is that why Strategic Vision 22 needed a U.S. team, because there was 23 U.S.-located fish? 24 A. There was U.S.-located information, 25 like fake passport numbers, fake Social Security</p>
<p style="text-align: right;">Page 151</p> <p>1 Q. I just want to be clear, though. Did 2 Strategic Vision deliver any social media 3 research reports? 4 A. I'm sure we did, somewhere. 5 Q. Did you verbally deliver a social media 6 research report to the client? 7 A. I believe we did. 8 Q. When would that have been? 9 A. Sometime during – between December and 10 January of 2017, '18. They were verbally, 11 verbally. And we may have had some 12 documentation. I can't remember. 13 Q. And what about current tracking 14 research, how was that conveyed to Ms. Wang or 15 Lianchao Han? 16 A. Mike did it with the USB key. 17 Q. And that was on January 30th of 2018? 18 A. Yes. 19 Q. Any other time? 20 A. Yes, there was another USB key earlier, 21 I think. 22 Q. It says on Eastern 7 that "all 23 deliverables shall be by USB drive only." 24 A. Correct. 25 Q. What does deliverables mean in that</p>	<p style="text-align: right;">Page 153</p> <p>1 numbers, fake names, Chinese, fake. A lot of 2 fakes. 3 Q. In the United States? 4 A. In the United States. On the list that 5 Guo gave us. 6 Q. It says on Eastern 7 that, "the 7 contractor guarantees that all information 8 provided is genuine." Do you see that? 9 A. Yes. 10 Q. It's in the criteria section. 11 A. Sure. 12 Q. How does Strategic Vision guarantee 13 that its information is genuine? 14 A. Based upon the individuals from whom we 15 were retrieving the information, providing of 16 course we were given – not given fake names and 17 fake passports and fake criteria to investigate. 18 Q. I just want to understand Strategic 19 Vision's process, though. How does it normally 20 go about guaranteeing the genuineness of the 21 information being provided to its clients? 22 A. Because we trust our sources, and our 23 sources do not make up nonsense. 24 Q. Does Strategic Vision ever do any 25 cross-checking or verification of the information</p>

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<p style="text-align: right;">Page 154</p> <p>1 provided by its sources?</p> <p>2 A. That's part of the idea that we had</p> <p>3 with having Team 1 and Team 2.</p> <p>4 Q. That's what you're talking about with</p> <p>5 the – how to get them document?</p> <p>6 A. Yeah. It's cross-checking, it's making</p> <p>7 sure, double verifying the same fact. You have a</p> <p>8 birthday over here and you have a birthday over</p> <p>9 there. They should be the same birthday. If</p> <p>10 they're not, there's something that we need to</p> <p>11 look at on a secondary basis.</p> <p>12 If you have a passport number over</p> <p>13 here, a U.S. passport, a U.S. visa number over</p> <p>14 here, and it doesn't match what we have within</p> <p>15 the state department, there's an issue. So we</p> <p>16 have to then go down that rabbit hole.</p> <p>17 Q. And that's a synthesis or an analysis</p> <p>18 process that Strategic Vision typically does with</p> <p>19 the information it's getting from its sources?</p> <p>20 A. That's correct.</p> <p>21 Q. I see. And that's how Strategic Vision</p> <p>22 typically feels comfortable guaranteeing that all</p> <p>23 the information is genuine?</p> <p>24 A. That's correct.</p> <p>25 Q. Did Strategic Vision have an</p>	<p style="text-align: right;">Page 156</p> <p>1 your sort of date of birth, and we turn around</p> <p>2 and we find out really your name is Joe Schmidt,</p> <p>3 and you were born in a totally different place,</p> <p>4 then we have to then rejig the entire system that</p> <p>5 we're working with.</p> <p>6 That's why it was extremely – not</p> <p>7 just – it wasn't just frustrating, but it was an</p> <p>8 extremely complex situation that you couldn't</p> <p>9 just do like you're checking somebody's credit</p> <p>10 report or Better Business Bureau thing. You just</p> <p>11 couldn't.</p> <p>12 Q. Well, just going back to Wallop 7.</p> <p>13 A. Whatever that is.</p> <p>14 Q. You're saying that – that's the list</p> <p>15 of fish?</p> <p>16 A. Yes.</p> <p>17 Q. You could take a look back at it if you</p> <p>18 want, but I don't think it's necessary.</p> <p>19 A. No. I sort of know these fish by now.</p> <p>20 Q. I was going to say, so how many of the</p> <p>21 fish were – was Strategic Vision provided with</p> <p>22 correct information for?</p> <p>23 A. Well, I can tell you, you can see some</p> <p>24 of my notes on here. Some of these – for</p> <p>25 instance, on page 3, you have Anita.</p>
<p style="text-align: right;">Page 155</p> <p>1 opportunity to verify that the information being</p> <p>2 provided was genuine in this instance?</p> <p>3 A. Yes and no.</p> <p>4 Q. Okay. How does that work; which part</p> <p>5 is yes and which part is no?</p> <p>6 A. Okay. Of course. Yes, we could verify</p> <p>7 in many cases that the information was correct,</p> <p>8 and then, if we found that it was incorrect, we</p> <p>9 would have to, like, double-check it.</p> <p>10 Q. No, I'm asking about what happened in</p> <p>11 this instance, with this research agreement. Was</p> <p>12 Strategic Vision able to determine that the</p> <p>13 information being provided back to the client was</p> <p>14 genuine?</p> <p>15 A. Yes.</p> <p>16 MR. SCHMIDT: Objection, but go ahead.</p> <p>17 A. Yes.</p> <p>18 Q. How did Strategic Vision do that?</p> <p>19 A. Because we compared apples and oranges</p> <p>20 and made sure that they were one and the same, as</p> <p>21 far as information that we were turning over</p> <p>22 based on – you have to understand, if we're told</p> <p>23 your name is John Smith, and we're given</p> <p>24 information on these documents from Guo that your</p> <p>25 name is John Smith, with a photograph and all of</p>	<p style="text-align: right;">Page 157</p> <p>1 Q. Yes.</p> <p>2 A. Her real mother is Mingduan Yao. Her</p> <p>3 adoptive parents, because that's done a lot in</p> <p>4 this basket, are Frank Suen, and then – then</p> <p>5 the – the mother – sorry, the mother is</p> <p>6 Mingduan Yao, and then the father of the sister,</p> <p>7 Mingshan – Mingshan Yao. These are the real</p> <p>8 parents of this girl, okay? But, in certain</p> <p>9 documentation, it's showing that these people</p> <p>10 are, in fact, her mother and father (indicating).</p> <p>11 They're not. They're her adopt – adoptive</p> <p>12 parents.</p> <p>13 Then if you go to here, if you go on to</p> <p>14 page 4, and it shows 1990 as her, I guess, entry,</p> <p>15 because I don't have the note on here; 1990 is</p> <p>16 her – maybe her entry into the United States</p> <p>17 visa. The Social Security number, if I recall</p> <p>18 correctly, and this is only on recall –</p> <p>19 Q. Sure.</p> <p>20 A. – was, in fact – here we go, on page</p> <p>21 5, it shows it, had the same Social Security</p> <p>22 number as a woman named Eileen Rodriguez, at the</p> <p>23 same address where this woman Anita was living.</p> <p>24 So then again, this is just one tidbit</p> <p>25 of one fish, or one person that you have to start</p>

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<p style="text-align: right;">Page 158</p> <p>1 tracking, and you have to understand where the</p> <p>2 pieces fit, or why.</p> <p>3 Q. And so just –</p> <p>4 A. If you go – yeah.</p> <p>5 Q. On that fifth page, those are your</p> <p>6 notes about –</p> <p>7 A. Yes.</p> <p>8 Q. – Eileen Rodriguez?</p> <p>9 A. Yes.</p> <p>10 Q. And what does –</p> <p>11 A. It's the same Social Security number.</p> <p>12 Q. And what's the money down there? It</p> <p>13 looks like it says 2,000 and –</p> <p>14 A. No, no. It's 2 million. 2.089.000.</p> <p>15 That, I believe, was the address where she was</p> <p>16 living, and it showed, if I recall correctly,</p> <p>17 again, I can't remember because I don't have it</p> <p>18 all in front of me, but she had sort of a credit</p> <p>19 limit of \$2,000 on a credit card, the only credit</p> <p>20 card she had, and then the house that she was</p> <p>21 living in somehow was bought in cash, but it</p> <p>22 doesn't show who the owners were of that</p> <p>23 residence.</p> <p>24 And then you get all these – you must</p> <p>25 have had four or five Social Security numbers</p>	<p style="text-align: right;">Page 160</p> <p>1 of whack, like numbers, passport numbers or visa</p> <p>2 numbers, or this one has an Australian</p> <p>3 nationality, some of the ones that we were doing</p> <p>4 in the U.K. had totally different names, but then</p> <p>5 they actually did match up if you dug deeper.</p> <p>6 Q. Okay. So some of them had – you had</p> <p>7 mentioned earlier had – were completely fake,</p> <p>8 they weren't –</p> <p>9 A. That's right.</p> <p>10 Q. – real people?</p> <p>11 A. That's right.</p> <p>12 Q. How many of the 15 fish were, in</p> <p>13 Strategic Vision's opinion or knowledge, fake?</p> <p>14 A. I would have to talk to Mike about</p> <p>15 that, but I think we – we came up with at least</p> <p>16 five or six that were fake, or at least had a lot</p> <p>17 of questions to be asked about them. The names</p> <p>18 did not match up with the names on the state</p> <p>19 department visas or on – within our channels.</p> <p>20 Q. In other words, there obviously was a</p> <p>21 person who looked like that fish in the –</p> <p>22 A. That's right.</p> <p>23 Q. – document?</p> <p>24 A. Yes.</p> <p>25 Q. But that the names and information</p>
<p style="text-align: right;">Page 159</p> <p>1 that were the same Social Security numbers for</p> <p>2 the same person.</p> <p>3 Q. So just going back to my original</p> <p>4 question, if you recall, how many of the</p> <p>5 information about the – well, strike that.</p> <p>6 A. There were a lot. There were at least</p> <p>7 three or four.</p> <p>8 Q. There were 15 fish, right?</p> <p>9 MR. SCHMIDT: Let him finish the</p> <p>10 question.</p> <p>11 Q. Yeah, let me just finish the question.</p> <p>12 Thanks.</p> <p>13 There were 15 fish, correct?</p> <p>14 A. Yes, initially.</p> <p>15 Q. And how many of them had information</p> <p>16 that, in Strategic Vision's knowledge, is false</p> <p>17 or inaccurate?</p> <p>18 A. I would say maybe six or seven. Maybe</p> <p>19 more.</p> <p>20 Q. And the remainder had, let's call it</p> <p>21 accurate information?</p> <p>22 A. I wouldn't call it accurate. It had to</p> <p>23 be double-checked.</p> <p>24 Q. Sure.</p> <p>25 A. So we found little things that were out</p>	<p style="text-align: right;">Page 161</p> <p>1 being provided were for –</p> <p>2 A. Were fake.</p> <p>3 Q. Were fake?</p> <p>4 A. If – if Guo was telling the truth</p> <p>5 about saying he paid \$250 million for this</p> <p>6 information, then he totally got, excuse me,</p> <p>7 screwed. He got totally screwed. Because the</p> <p>8 information in here, just from what we were able</p> <p>9 to surmise, was rubbish, and that's real – the</p> <p>10 real garbage.</p> <p>11 Q. Okay. Let's go back to the research</p> <p>12 agreement, that's Wallop 9.</p> <p>13 A. Yes, let's go.</p> <p>14 Q. And we'll – I do want to check on</p> <p>15 lunch. I know it's 1:30 now. Let me just go see</p> <p>16 about that. Let's go off the record for a</p> <p>17 second.</p> <p>18 A. Do you want to finish this?</p> <p>19 Q. Well –</p> <p>20 A. I'd rather finish this.</p> <p>21 Q. Let's keep going, sure. I'm sure</p> <p>22 they'll knock when the time comes.</p> <p>23 A. I'm sure they will.</p> <p>24 Q. Let's talk about irregular</p> <p>25 circumstances. Do you see that paragraph?</p>

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<p style="text-align: right;">Page 162</p> <p>1 A. Yes.</p> <p>2 Q. Did you and Mr. Waller draft this</p> <p>3 section?</p> <p>4 A. Dr. Waller, yes, we did.</p> <p>5 Q. And what was the intent or purpose</p> <p>6 behind drafting this section?</p> <p>7 A. I wouldn't call it intent. That's --</p> <p>8 that's truly not fair. It was a protective</p> <p>9 element for life. You can't always say that it's</p> <p>10 going to be 100 percent of everything every</p> <p>11 second of every day. You cannot. It's not</p> <p>12 there, it's not gonna happen.</p> <p>13 So irregular circumstances by us, and</p> <p>14 including Guo, said that both parties understand</p> <p>15 that occasional unforeseen challenges may arise</p> <p>16 that will slow or block comprehensive research,</p> <p>17 and that there may be periods in which</p> <p>18 information is irregular, unavailable or</p> <p>19 incomplete.</p> <p>20 Perfect reference are some of these</p> <p>21 names in here. The contractor will endeavor to</p> <p>22 make all research and reports as complete as</p> <p>23 possible in a timely scheduled manner. Which</p> <p>24 does not mean ten days from the beginning of the</p> <p>25 contract.</p>	<p style="text-align: right;">Page 164</p> <p>1 unavailable for a time; is that fair to say?</p> <p>2 A. Which Guo understood completely. At</p> <p>3 least he said he did.</p> <p>4 Q. When did he tell you that?</p> <p>5 A. Several times. I think it was probably</p> <p>6 the middle of January when we met him, and then</p> <p>7 on the 26th, even though he was upset we didn't</p> <p>8 have everything by Chinese New Year, or some kind</p> <p>9 of new criteria.</p> <p>10 Q. Did you understand that the research</p> <p>11 was needed in a very tight schedule because of</p> <p>12 the Chinese New Year?</p> <p>13 A. No.</p> <p>14 Q. When did you come to understand that?</p> <p>15 A. Later, when we realized that that</p> <p>16 seemed to be his issue.</p> <p>17 Q. When did you first talk about getting</p> <p>18 the information by Chinese New Year with Mr. Guo</p> <p>19 or Yvette Wang --</p> <p>20 A. Never.</p> <p>21 Q. -- or Lianchao?</p> <p>22 A. Never. Not until much later, I mean,</p> <p>23 after the fact.</p> <p>24 Q. No, that's what I'm trying to find out</p> <p>25 when --</p>
<p style="text-align: right;">Page 163</p> <p>1 Q. Has Strategic Vision ever used a clause</p> <p>2 that's substantially the same or similar to this</p> <p>3 irregular circumstances clause in other</p> <p>4 agreements?</p> <p>5 A. I'm sure there have been ones that have</p> <p>6 been similar to it. I mean, it's not unusual.</p> <p>7 This is -- this is the form that is taken.</p> <p>8 Q. In terms of Strategic Vision's</p> <p>9 experience in this field, was the research</p> <p>10 bargained for in this research agreement, did it</p> <p>11 encounter irregular circumstances or problems</p> <p>12 from the outset?</p> <p>13 A. I would say when we started getting</p> <p>14 into it, we found that there were irregularities.</p> <p>15 That's not to say that we couldn't continue</p> <p>16 digging to find the answer. But we certainly</p> <p>17 found irregularities when we were talking to Team</p> <p>18 2 in Texas about these people.</p> <p>19 Q. Right. So just in terms of, any</p> <p>20 project has some problems, no investigatory</p> <p>21 research project just goes off without a hitch,</p> <p>22 correct?</p> <p>23 A. Correct.</p> <p>24 Q. So there's always some issues that</p> <p>25 either slow down the research or make information</p>	<p style="text-align: right;">Page 165</p> <p>1 A. Oh.</p> <p>2 Q. When that was.</p> <p>3 A. After the fact, so sometime in the</p> <p>4 early part of February, I guess. I think maybe</p> <p>5 Lianchao sort of said that to us.</p> <p>6 Q. Okay. But prior to the contract, there</p> <p>7 was no discussion about --</p> <p>8 A. No.</p> <p>9 Q. -- Chinese New Year or anything like</p> <p>10 that?</p> <p>11 A. No.</p> <p>12 Q. If irregular circumstances arise, does</p> <p>13 the client have to pay for not receiving any</p> <p>14 research?</p> <p>15 A. Of course. It's the risk we both take.</p> <p>16 Q. And has that occurred in the past with</p> <p>17 Strategic Vision's clients?</p> <p>18 A. Yes.</p> <p>19 Q. So even though Strategic Vision is</p> <p>20 unable to provide, let's just say, any research</p> <p>21 because of an irregular circumstance, the client</p> <p>22 still has to pay the full price of the reports?</p> <p>23 A. It's our time that it takes to do what</p> <p>24 we're doing. We wouldn't find it out, would we,</p> <p>25 unless we had done the investigation. So it's</p>

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<p style="text-align: right;">Page 166</p> <p>1 our time.</p> <p>2 Q. But if the compensation is monthly, and</p> <p>3 time-based, essentially, is there any period</p> <p>4 where irregular circumstances would result in a</p> <p>5 pause of the client's obligation to make payment?</p> <p>6 MR. SCHMIDT: Objection. It's been</p> <p>7 answered, but go ahead.</p> <p>8 A. I'd like to ask any law firm. Give me</p> <p>9 a break.</p> <p>10 Q. Well, I'm asking you the question,</p> <p>11 though, so, please.</p> <p>12 A. Well, you can ask the question, but I'm</p> <p>13 telling you, it's just like a law firm, we</p> <p>14 operate in the same way.</p> <p>15 MR. SCHMIDT: That's the answer. You</p> <p>16 got your answer.</p> <p>17 MR. GRENDI: I'm gonna just clean it</p> <p>18 up. Thank you.</p> <p>19 Q. So, in your mind, or in Strategic</p> <p>20 Vision's understanding, it's compensated for the</p> <p>21 time it spends trying to do research, not based</p> <p>22 upon what's actually delivered?</p> <p>23 MR. SCHMIDT: Objection.</p> <p>24 A. Yes.</p> <p>25 Q. What's the cost of a report under this</p>	<p style="text-align: right;">Page 168</p> <p>1 it is.</p> <p>2 Q. Yeah, Eastern 9 is the Bates number.</p> <p>3 A. Okay, yes.</p> <p>4 Q. Do you see where it says, "It is</p> <p>5 understood that client may direct other entities</p> <p>6 to pay the contractor"? It's in the –</p> <p>7 A. Yes.</p> <p>8 Q. What was the purpose of this clause?</p> <p>9 A. Well, it was very simple, but,</p> <p>10 apparently, Mr. Guo didn't understand how</p> <p>11 important it was.</p> <p>12 Q. Well, why was this clause inserted into</p> <p>13 the agreement; what was the meaning of it?</p> <p>14 A. Because we had told him that, and they</p> <p>15 had told us that it was coming through a William</p> <p>16 Wu in London from their account somewhere else in</p> <p>17 the U.K. or Europe, and we had told them</p> <p>18 explicitly that it should not come from Hong Kong</p> <p>19 or an Asian account; and, guess what, it did, and</p> <p>20 that was because of the mainland Chinese</p> <p>21 intelligence services then finding out who Guo</p> <p>22 and his people in Hong Kong were paying for this</p> <p>23 kind of – for a contract, let's just put it that</p> <p>24 way.</p> <p>25 Q. So was the purpose of this clause to</p>
<p style="text-align: right;">Page 167</p> <p>1 research agreement?</p> <p>2 A. Well, you have it here. It's listed.</p> <p>3 It's complex, depending upon the menu that he</p> <p>4 chose to work with.</p> <p>5 Q. Are you looking on page – well,</p> <p>6 Eastern 8?</p> <p>7 MR. SCHMIDT: There's a knocking on the</p> <p>8 door.</p> <p>9 THE WITNESS: Saved by your knock.</p> <p>10 MR. GRENDI: Let me see if that's it.</p> <p>11 We'll go off. I think it's about time.</p> <p>12 THE VIDEOGRAPHER: Off the record at</p> <p>13 1:42.</p> <p>14 (Whereupon a luncheon recess was</p> <p>15 taken.)</p> <p>16 THE VIDEOGRAPHER: Back on the record</p> <p>17 at 2:30.</p> <p>18 Q. Good afternoon. Ms. Wallop, you still</p> <p>19 understand that you're under oath?</p> <p>20 A. Yes.</p> <p>21 Q. On this Exhibit Number 9, on page</p> <p>22 Eastern 9.</p> <p>23 A. Just a second.</p> <p>24 Q. I think it's right in front of you.</p> <p>25 A. Oh, okay. Number 9, page 9, whatever</p>	<p style="text-align: right;">Page 169</p> <p>1 prevent the Chinese communist party from finding</p> <p>2 out about this relationship?</p> <p>3 A. Yes, for our safety and the safety of</p> <p>4 our – our contractors or our teams.</p> <p>5 Q. Was it ever contemplated that the money</p> <p>6 would come to an entity other than Strategic</p> <p>7 Vision, to protect Strategic Vision's identity?</p> <p>8 A. Yes. It was supposed to come from a</p> <p>9 U.K. account to our account, from – from him,</p> <p>10 from Guo, through his money manager in the U.K.,</p> <p>11 as we understood it.</p> <p>12 Q. When was that discussed?</p> <p>13 A. It was discussed when – just before we</p> <p>14 agreed to the contract, to the terms of the</p> <p>15 contract, or the agreement. We shouldn't call it</p> <p>16 a contract, as it's an agreement.</p> <p>17 Q. And how did that issue come up; did you</p> <p>18 bring it up or was it –</p> <p>19 A. Mike and I both raised it.</p> <p>20 Q. Okay. And what was just the substance</p> <p>21 of that discussion?</p> <p>22 A. The security fact that it was dangerous</p> <p>23 for all of us to be connected with him based upon</p> <p>24 the investigation that we would be doing, and if</p> <p>25 that investigation of the mainland Chinese</p>

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<p style="text-align: right;">Page 170</p> <p>1 hierarchy and their families was disclosed as a 2 result of the funding that he was doing to us 3 directly. 4 Q. Did you ever consider, on the recipient 5 side, using another entity to receive the money, 6 other than Strategic Vision? 7 A. No. The agreement was with Strategic 8 Vision. We had no idea who Eastern was. 9 Q. Let me ask you about the next sentence 10 there. It says, "all client payments must be 11 received by the contractor by wire transfer 12 within five business days of invoice," do you see 13 that? 14 A. Yes. Somewhere. 15 Q. It's the last sentence in that 16 paragraph. 17 A. Yes. 18 Q. Did Strategic Vision issue any invoices 19 to Eastern? 20 A. We were – no. 21 Q. So there was never a time when 22 Strategic Vision sent an invoice document saying 23 you owe this money to us, to Strategic – or to 24 Eastern Profit, excuse me? 25 A. That's when Lianchao was involved, and</p>	<p style="text-align: right;">Page 172</p> <p>1 Q. Was that on January 6th, the day it was 2 signed? 3 A. I think so. 4 Q. And how did that come up? 5 A. Yvette said that was who was going to 6 be signing it. 7 Q. What did you say in response to that, 8 if anything? 9 A. I asked her, I said, who's Eastern 10 Profit? She said, Mr. Guo's company, or some 11 such thing. 12 Q. Then you checked where Eastern Profit 13 Corporation Limited was incorporated? 14 A. If I recall, when we were in the 15 federal court, you didn't know where – 16 Q. I'm asking you a question. 17 A. No, I'm – 18 MR. SCHMIDT: Just answer – 19 A. I'm trying to answer it. I don't know 20 because I couldn't find anything; when we went to 21 sort of look it up, there wasn't anything that we 22 could find in this country. 23 Q. What I'm asking is, did you look up 24 Eastern Profit Corporation Limited on January 6, 25 2018, did you try to figure out where it was from</p>
<p style="text-align: right;">Page 171</p> <p>1 he explicitly told Guo that he did owe the 2 amount. We never got paid for January, we never 3 got paid for February. We had the agreement, 4 which outlined the terms. We gave Guo the first 5 two weeks, essentially, free on our own ticket. 6 So from the 16th to the 26th was ten days that we 7 were into the contract. So if you've taken it 8 from the 16th of January to the 16th of February, 9 that's when an invoice technically should have 10 gone out to him. But we believed we were still 11 pulling information, and we wanted to be able to 12 have as much as possible for him, and, in the 13 meantime, he pulled his stunt with the lawsuit on 14 the 23rd. And I was out of the country, so I 15 didn't know anything about it. 16 Q. So Strategic Vision never sent Eastern 17 an invoice prior to February 23rd, 2018? 18 A. We did not, but we should have. In 19 hindsight, we thought that we were – we thought 20 that we were being honest. 21 Q. When was the first time Eastern Profit 22 Corporation was included in this contract, in a 23 draft of it I should say? 24 A. It was never, until this particular 25 document, to my knowledge.</p>	<p style="text-align: right;">Page 173</p> <p>1 then? 2 A. No. 3 Q. Did you know it was domiciled in China? 4 A. I had no idea. They certainly didn't 5 reveal that to us, as they should have. 6 Q. Did you ask them where it was 7 domiciled? 8 A. Yvette didn't know. 9 Q. I'm asking if you asked? 10 A. I asked Yvette. She didn't know. 11 Q. When was that? 12 A. At the signing. I said, what is this 13 Eastern Profit Corporation? 14 Q. You asked, what is this Eastern Profit 15 Corporation? 16 A. Yes. 17 Q. And what did she say? 18 A. She said, I don't know, it's something 19 that Mr. Guo has his own – it's his own company. 20 Q. And was there any followup to that or 21 was that the end – 22 A. No. 23 Q. – of the discussion? 24 A. That was the end of the discussion. 25 Q. Okay.</p>

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<p style="text-align: right;">Page 174</p> <p>1 A. It was supposed to be funded. The</p> <p>2 entire contract was supposed to be funded.</p> <p>3 Apparently, it wasn't.</p> <p>4 Q. Let's go back to Exhibit 7. I think</p> <p>5 previously you had mentioned that you saw this</p> <p>6 Exhibit 7 when Mr. Guo put it on a table at a</p> <p>7 meeting, is that right?</p> <p>8 A. I believe this is correct.</p> <p>9 Q. And when was the next time you saw this</p> <p>10 information?</p> <p>11 A. When we actually printed it off from</p> <p>12 the USB key. After three different attempts of</p> <p>13 corrupted USB keys from Yvette, we finally were</p> <p>14 able to print it off ourselves onto a virgin</p> <p>15 computer.</p> <p>16 Q. Okay. When did – when was the first</p> <p>17 time you saw this information after the coffee</p> <p>18 table viewing?</p> <p>19 A. When we printed it off after we got the</p> <p>20 corrupted USB keys from Yvette.</p> <p>21 Q. What date was that?</p> <p>22 MR. SCHMIDT: What date?</p> <p>23 A. Oh, I'm sorry. I guess it was about</p> <p>24 the – oh, God, about the – oh, the 8th, the 8th</p> <p>25 of January it would have been. It would have</p>	<p style="text-align: right;">Page 176</p> <p>1 to Strategic Vision?</p> <p>2 A. None, other than a friend who kindly</p> <p>3 was trying to see if there was something the</p> <p>4 matter with the flash drives, which clearly there</p> <p>5 were. So then I came to New York on Monday to</p> <p>6 meet her, that is Yvette, at the Pierre, in the</p> <p>7 lobby. I brought another computer. She brought</p> <p>8 three flash drives. One worked, and that was</p> <p>9 this, this one; in other words, this file. The</p> <p>10 other two were corrupted.</p> <p>11 I kept them, kept all of the flash</p> <p>12 drives. I took the one that was good, I brought</p> <p>13 it back to Washington and put it into a virgin</p> <p>14 computer, and then we printed this thing off. A</p> <p>15 virgin computer, for the benefit of the court, is</p> <p>16 one that has no connection to the internet and/or</p> <p>17 a printer that has any connection to an internet.</p> <p>18 So it's like a dumb computer.</p> <p>19 Q. Does Strategic Vision have any kind of</p> <p>20 confidentiality arrangement with Richard Shewell?</p> <p>21 A. No.</p> <p>22 Q. Is Richard Shewell a member of the team</p> <p>23 or otherwise –</p> <p>24 A. No.</p> <p>25 Q. Let me just finish the question for the</p>
<p style="text-align: right;">Page 175</p> <p>1 been Monday, because I had to come up to New York</p> <p>2 to get it.</p> <p>3 Q. So you didn't see the information in</p> <p>4 Exhibit 7 on January 6, 2018 when it was – the</p> <p>5 contract was signed?</p> <p>6 A. No.</p> <p>7 Q. You didn't view it?</p> <p>8 A. I – it wouldn't open, that was the</p> <p>9 problem. That's why I had to come to New York.</p> <p>10 On the 6th, she gave us three keys, three USB</p> <p>11 keys. Two would not open. The third one would</p> <p>12 not open on my computer, and so that's when I</p> <p>13 took it to my neighbor and he was kind enough to</p> <p>14 put it into his computer, just to see if anything</p> <p>15 would open. All it was was complete corrupted</p> <p>16 file, just nothing but Chinese characters all</p> <p>17 over the place. It had no – nothing like this.</p> <p>18 So we both starting pulling all of the wires out</p> <p>19 of his computers and his hard drives and – yeah,</p> <p>20 and yanked the flash drive out and everything</p> <p>21 else. It was a nightmare.</p> <p>22 Q. And who's your neighbor?</p> <p>23 A. You have the letter. His name is</p> <p>24 Richard Shewell, S-h-e-w-e-l-l.</p> <p>25 Q. And What's Mr. Shewell's relationship</p>	<p style="text-align: right;">Page 177</p> <p>1 record. Is Richard Shewell part of Strategic</p> <p>2 Vision's team or teams that provide investigatory</p> <p>3 research?</p> <p>4 A. No.</p> <p>5 Q. So once you've accessed this</p> <p>6 information on January 8th, what did Strategic</p> <p>7 Vision do next?</p> <p>8 A. On January 8th?</p> <p>9 Q. Yes. Now that you have the list of</p> <p>10 fish.</p> <p>11 A. So now that we've printed off this</p> <p>12 file, then Mike came and we sat down and we</p> <p>13 started talking about how we were going to –</p> <p>14 where we could – which certain things we could</p> <p>15 put together and enter into our channels for</p> <p>16 information. And then we – then he got in touch</p> <p>17 with Team 1, that had been sort of sitting on</p> <p>18 hold, and then – then there were meetings with</p> <p>19 Team 1 leader, and we began.</p> <p>20 Q. So just this initial process with</p> <p>21 Dr. Waller, were you parsing to see who was going</p> <p>22 to do what in terms of the investigation, is that</p> <p>23 fair?</p> <p>24 A. Somewhat, yes. It's a very complex</p> <p>25 investigation. It takes the U.S. side as well as</p>

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<p style="text-align: right;">Page 178</p> <p>1 international side. We had to divide up the 2 issues. 3 Q. Were there aspects of the research that 4 he was going to handle and aspects that you were 5 going to handle, or Strategic Vision was going to 6 handle? 7 A. I would say so, yes. 8 Q. And what portion of the research was 9 assigned or delegated to Strategic Vision, or you 10 personally? 11 A. The U.S. side, where we felt that we 12 could pull certain pieces of information legally 13 from U.S. channels, so we had to go through and 14 see who supposedly had a U.S. passport, U.S. 15 visas, or who had, you know, illegitimate 16 children born in the United States. It was a – 17 it was big. It was a big issue. 18 Q. And what portion – I take it Mr. 19 Waller was going to do the international portion? 20 A. No, Dr. Waller. 21 Q. I'm sorry. I was calling him Mr. 22 Waller the whole last deposition, so correct me, 23 please, feel free. Dr. Waller. 24 What was Dr. Waller assigned to in 25 terms of this division?</p>	<p style="text-align: right;">Page 180</p> <p>1 Q. Of course not. Right. 2 A. I want the court to be – have a very 3 clear reading of what is being asked. 4 Q. Me, too. 5 A. Good. 6 Q. And so then how did you – were you 7 managing the U.S.-based process personally? 8 A. Yes. Um-hum. 9 Q. So you've got the information on 10 January 8th. What did you do in terms of that 11 process? What was – 12 A. Mike and I, as I said, divided up what 13 needed to be done. I got in touch with my 14 channels, he got in touch with his channels. 15 Q. Just without even saying who your 16 channels are or what they do, did you get in 17 touch with several people; how many people did 18 you get in touch with? 19 A. I have no idea. There were a number of 20 people. 21 Q. And did you receive valuable 22 information from those people? 23 A. Some, I did and some was – was fake 24 information. You have to understand that we were 25 given fake names and fake information to either</p>
<p style="text-align: right;">Page 179</p> <p>1 A. He was assigned to work with Team 1 to 2 help pull the information with Team 1, because 3 there were a number of things that they had to 4 get into, but they could only do it from an 5 overseas location. 6 Q. I see. So none of the U.S.-based 7 investigatory research was handled by Team 1? 8 A. No. Well, no. It was all done – it 9 was done through the U.S. side. 10 Q. And that was not Team 1? 11 A. No, it's never been Team 1. 12 Q. Got it. I just want to be clear about 13 it. The way you're saying no could be 14 interpreted multiple ways, so I just want to be 15 super clear. 16 A. Not really. 17 Q. Okay. 18 MR. SCHMIDT: Just – 19 THE WITNESS: I know. It's silly. 20 Q. You could just – it's not. It's a – 21 you have to understand, ma'am, it's a record that 22 we're trying to keep clear for the court, and I 23 just don't want there to be ambiguity. 24 A. I wouldn't want any ambiguity for the 25 court.</p>	<p style="text-align: right;">Page 181</p> <p>1 send us down rabbit holes for nothing, a waste of 2 time, or we could find legitimately that there 3 were some people that we could actually piece 4 together some of the tracking. But their names 5 had been changed. They kept changing their 6 names. 7 Q. So when did you – when did you first 8 find out that, in your understanding, some of the 9 names were fake; when did that happen? 10 A. I would say probably within the 11 first – probably within the first ten days. And 12 we discussed that with Lianchao and we discussed 13 it with – with Guo. 14 Q. Okay. How was – was there a meeting 15 with Lianchao – 16 A. Yes. 17 Q. – and Guo where that was discussed? 18 A. Yes. 19 Q. Where was that? 20 A. In New York, at his apartment. We 21 never met Guo outside of his apartment. He never 22 left his apartment. 23 Q. And when did that meeting occur? 24 A. I guess it was, as I said, within the 25 ten days from the 8th, 9th, which was like a</p>

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<p style="text-align: right;">Page 182</p> <p>1 Monday or a Tuesday, to about the 15th or so of 2 the month, 16th, something like that. 3 Q. Was Ms. Wang there? 4 A. Where? 5 Q. At that meeting that you've just 6 described. 7 A. Who knows. He kept saying he didn't 8 trust her. 9 Q. I'm asking whether you recall her being 10 present? 11 A. No, I don't remember, because sometimes 12 she was in there and sometimes Lianchao was 13 there, so I don't remember. He said he didn't 14 trust her, so a lot of times he sent her out. 15 Q. In other words, she might have been in 16 the area, in the building that you were meeting 17 in, but he would say, leave the room? 18 A. Yes. 19 Q. And you would have the meeting without 20 her? 21 A. Yes, that happened. 22 Q. How many times did that – 23 A. On several occasions. 24 Q. And were you and Dr. Waller 25 coordinating and checking in on the research</p>	<p style="text-align: right;">Page 184</p> <p>1 A. That tended to be the case. I mean, he 2 might say, I've landed, or he might say, I just 3 finished my meeting, or, I'm on the way back. 4 That's about the limit of it. 5 Q. And would those be Signal messages or 6 some other communication means? 7 A. Usually on Signal. 8 Q. Did you keep your Signal messages with 9 Dr. Waller? 10 A. I turned over everything I had to – 11 whatever is there to Joe. 12 Q. Right. I'm asking – 13 A. To the law firm. 14 Q. I'm asking if you – did you delete 15 Signal messages you had with – 16 A. Some I have. 17 Q. – Dr. Waller? 18 A. I always do. Because some I – I don't 19 keep Sig – all of my Signal messages. That 20 means for everybody, not just for Guo. 21 Q. I understand. And why is it your 22 practice to delete messages like that? 23 A. Because that's what it's set up for. 24 That's what Signal does. 25 Q. Oh, there's like an automatic</p>
<p style="text-align: right;">Page 183</p> <p>1 after this January 8th start date? 2 A. Oh, yeah. I mean, obviously, I 3 couldn't – I could only do from my side what I 4 could do on retrievals. What he was doing with 5 Team 1 was – was totally different because it 6 was overseas, and so, therefore, he was 7 coordinating with the person on the overseas 8 retrieval, and I was not a party to that. 9 Q. Right. How did you check in with one 10 another? Would you meet in – 11 A. Daily. 12 Q. – D.C.? 13 A. No, no, no, he would come to my home. 14 We never did anything on the telephone. 15 Q. So after – well, starting on 16 January 8th, you and Dr. Waller were meeting 17 almost daily to handle this investigation? 18 A. I would say so, yes. 19 Q. But of course you couldn't communicate 20 with him when he was flying to Europe or things 21 of that nature, correct? 22 A. No. 23 Q. Because you wouldn't. Because, even 24 though you could communicate with him, for 25 security reasons, you would not do that?</p>	<p style="text-align: right;">Page 185</p> <p>1 destruction policy? 2 A. There's an automatic destruction thing, 3 it's 30 minutes or 30 whatever. An hour. 4 Q. Okay. That's one of the features of 5 the application? 6 A. Yes. 7 Q. Did you ever ask Mr. Guo or Lianchao or 8 Yvette Wang how they got the information in 9 Exhibit 7? 10 A. Yes, they told me. 11 Q. What did they tell you? 12 A. Guo said, this is the file, he slammed 13 down on the coffee table like that in front of me 14 in his apartment, in his sun room, and said, this 15 is what we need to investigate, these are the 16 people we need to look into, and, here, you can 17 look through the names. And I said, wow. He 18 said, I paid \$250 million for this. I said, 19 really. 20 Q. I take it you didn't believe that 21 price? 22 A. I found that extraordinary, given just 23 even the preliminary stuff that was on it. 24 Q. And did he explain to you how the 25 information was obtained by him, other than</p>

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<p style="text-align: right;">Page 186</p> <p>1 obviously paying for it, what means were 2 employed? 3 A. He bribed people to get it, bribed 4 people to take photographs of passports, I guess. 5 I don't know. 6 Q. Did he tell you that or is that your 7 assumption? 8 A. He actually told me that. I mean, he 9 said that in the meeting. He said, yeah, I had 10 to bribe people to take pictures of passports. 11 Otherwise, I don't know where the other 12 information came from. 13 Q. Let's go to the next document. 14 (Wallop Exhibit 10, Signal messages, 15 Bates stamped Eastern-0000201, marked for 16 identification.) 17 Q. This has been marked Wallop 10. Do you 18 recognize this Signal thread? 19 A. Well, it looks like it's from me, and 20 probably to Yvette. 21 Q. Did you ever exchange Signal messages 22 with Lianchao Han? 23 A. I'm sure I have. It may or may not 24 have had anything to do with this, the contract. 25 Q. So you've worked with Mr. Han on other</p>	<p style="text-align: right;">Page 188</p> <p>1 Q. Did you discuss any other terms at that 2 point, or was that just the focus, the number of 3 fish, during the first month? 4 A. It was the number of fish for the first 5 month. 6 Q. I'm asking from your memory – 7 A. Yes. 8 Q. – do you recall discussing any other 9 terms of the agreement? 10 A. No, we didn't change that term. She 11 knew that, in the second month, it would be ten 12 fish. 13 Q. And did you redraft or edit the 14 agreement based upon this discussion? 15 A. Not that I recall, no. 16 Q. Well, you did put in that there would 17 be 15 fish during the first month instead of 18 the – 19 A. Yes, because we'd already – when was 20 this? This was 12/29. 21 Q. 28. 22 A. 12/28. And I can't even remember on 23 the contract whether it's – I don't know if we 24 even defined whether it was 15 in the first month 25 or not, but we went ahead and agreed to the 15;</p>
<p style="text-align: right;">Page 187</p> <p>1 matters or – 2 A. Well, we're pro-democracy, and he 3 represents a pro-democracy group in Washington; 4 and so, yes, there are issues that are going on 5 about the mainland that had nothing to do with 6 Guo. 7 Q. Going to Eastern 203. 8 A. Yes. 9 Q. Do you see where it says, "yes let's 10 discuss now"? 11 A. Yes. 12 Q. And below that there's like a little 13 phone symbol, do you see that? 14 A. Correct. 15 Q. Do you recall speaking to Ms. Wang 16 about this agreement on or about December 28th? 17 A. That would have been correct, because 18 that's when they sort of were changing the terms 19 of the contract from ten fish to 15 fish, and 20 that's what the 15 refers to in her... 21 Q. And you had a phone conversation about 22 that? 23 A. Yes, it's right here. And then I put 24 it in – or she put it in there, and then you'll 25 see the rest of it.</p>	<p style="text-align: right;">Page 189</p> <p>1 so, gave her five fish, basically. 2 Q. Did you ever give her a copy of the 3 agreement for her to make edits? 4 A. Yes. 5 Q. When was that? 6 A. Because when we talked about it, she 7 was talking to Guo all the time on the telephone, 8 and we made edits. I remember when she was at 9 the house earlier that – maybe during this time 10 frame, the 29th, or 28th or something. "We are 11 looking at your changes and have made a combined 12 document based on our conversation yesterday and 13 our mutual agreement." This was on the 29th. 14 So we made it at my house, and then we 15 agreed to it, and then I went and printed it off 16 from my printer. 17 Q. Right. What I'm asking is, did you – 18 you physically gave her a – 19 A. Yeah. 20 Q. – a paper copy? 21 A. Yes, we both did. I mean, we both had 22 the same piece of paper that we were scratching 23 up and redoing. 24 Q. I wasn't sure of that, that's why I'm 25 asking. I don't know that.</p>

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<p style="text-align: right;">Page 190</p> <p>1 So she left with a copy of the draft</p> <p>2 agreement on or about –</p> <p>3 A. I believe so –</p> <p>4 Q. – December 29th?</p> <p>5 A. – yes. It says here, "most easy</p> <p>6 edits, no worries."</p> <p>7 Q. And that was your comment, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Why did you think they were mostly easy</p> <p>10 edits?</p> <p>11 A. Well, because she had – she had made</p> <p>12 the suggestion on the edits, so I made the</p> <p>13 agreement to go ahead and make the little</p> <p>14 changes, whatever they were.</p> <p>15 Q. And did you meet with Ms. Wang again on</p> <p>16 or about December 30th?</p> <p>17 A. Honestly, I can't remember the 30th. I</p> <p>18 do remember the – I guess it says – see, here</p> <p>19 it's the 5th. I think it was the 5th that I met</p> <p>20 her next.</p> <p>21 Q. Let me ask you this. Do you recall a</p> <p>22 meeting with Ms. Wang where you thought that she</p> <p>23 was proposing major and unreasonable changes?</p> <p>24 A. Somewhere in that earlier part of that</p> <p>25 conversation, and that's when we made the changes</p>	<p style="text-align: right;">Page 192</p> <p>1 A. No. It was Mandarin, so he was just</p> <p>2 speaking to his employee, I guess.</p> <p>3 Q. But you – sitting here today, you're</p> <p>4 not certain that it was him?</p> <p>5 A. I could hear his voice, so it sounded</p> <p>6 like him.</p> <p>7 Q. Turning to Eastern 206.</p> <p>8 A. Yes.</p> <p>9 Q. Do you see this message talking about</p> <p>10 "unfortunately they could not stop the process</p> <p>11 technically. My Boss said he had already</p> <p>12 contacted you about this fund...we were</p> <p>13 discussing last week, as I advised you that our</p> <p>14 people were ready to send you the deposit." Do</p> <p>15 you see that?</p> <p>16 A. I do. I was very confused by that.</p> <p>17 Q. There's a PDF that was attached to this</p> <p>18 document, do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Do you have any recollection as to what</p> <p>21 was sent to you on or about January 2nd</p> <p>22 concerning this deposit?</p> <p>23 A. This was, I believe, the copy of the</p> <p>24 DBS wire. I'm not sure, but I think it was.</p> <p>25 Q. And what was your response to receiving</p>
<p style="text-align: right;">Page 191</p> <p>1 in the edits. She then consulted with Guo. Guo</p> <p>2 agreed to them, there might have been something</p> <p>3 he disagreed with, and then he disagreed with</p> <p>4 her, and then we went back and re-did the edit</p> <p>5 back to sort of what the original language must</p> <p>6 have been in the final copy that she signed, and</p> <p>7 he agreed to, on the telephone.</p> <p>8 Q. Was that on January 6th, on the actual</p> <p>9 date of the signing?</p> <p>10 A. No, it was a little bit earlier. I</p> <p>11 think it goes back here to wherever we were</p> <p>12 talking about mostly easy edits.</p> <p>13 Q. Okay. Was Mr. Guo on the phone when</p> <p>14 you and Ms. Wang signed the agreement?</p> <p>15 A. Yes, I think he was. I think he was.</p> <p>16 Because she sat on the sofa with me, and that's</p> <p>17 where she was talking to somebody, so I – in</p> <p>18 Mandarin, so I presume that's who it was.</p> <p>19 Q. Okay. So you didn't know who she was</p> <p>20 talking to at that point, but –</p> <p>21 A. No, but she – it was clear to me that</p> <p>22 it was Guo. She just sort of hung up, she said,</p> <p>23 okay, fine, we all agree, everything is fine.</p> <p>24 Q. But he wasn't on speakerphone, so you</p> <p>25 didn't hear his voice?</p>	<p style="text-align: right;">Page 193</p> <p>1 the wire? Because, correct me if I'm wrong, but</p> <p>2 the contract had not been signed as of</p> <p>3 January 2nd, 2018, correct?</p> <p>4 A. Not by the 2nd, but we had agreed to</p> <p>5 everything on the terms, even though she had to</p> <p>6 come back from New York to sign the document; we</p> <p>7 had agreed by telephone.</p> <p>8 Q. Were you surprised to receive the money</p> <p>9 at that time?</p> <p>10 A. Not entirely. But we – we – it came</p> <p>11 from a source that we didn't know who it was. It</p> <p>12 came from ACA Capital or something. We didn't</p> <p>13 know who that was.</p> <p>14 Q. So how did you find out about that?</p> <p>15 Did this message prompt you to check your account</p> <p>16 or was it that you checked your account and said,</p> <p>17 why is there a million dollars there? What was</p> <p>18 the process?</p> <p>19 A. It was very simple. I got this</p> <p>20 message –</p> <p>21 Q. I see.</p> <p>22 A. – I checked the account. Something</p> <p>23 from ACA was there. Said, my boss, meaning Guo,</p> <p>24 said he had already contacted us about this fund.</p> <p>25 We never got any contact from Guo. Never. Never</p>

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<p style="text-align: right;">Page 194</p> <p>1 received a phone call, never received a text, 2 nothing. So I don't know what she's talking 3 about here. 4 "Our contract won't be changed if there 5 is a chance to work together. Otherwise please 6 kindly return fund." These people were like 7 ping-pong balls, okay? You're just trying to do 8 what they're asking you to do, you get everything 9 in order to do it, and then they fool around with 10 this nonsense. 11 Q. Did you consider sending the wire back 12 because you didn't have a signed contract or – 13 A. No, because we already had agreed to 14 this verbally. Both Guo and herself had agreed 15 to it. And so she then comes down on the 5th, 16 and signs the thing on the 6th. 17 Q. And so, going back to the 6th. Were 18 there any changes made to the agreement at that 19 time? 20 A. No, none. The only change was that I 21 accepted the 15 fish instead of the ten, I mean, 22 verbally. It was a verbal, honorable thing to 23 do. And then here's my thing saying right what I 24 said on whatever it is, 208, as discussed with 25 the 15 fish.</p>	<p style="text-align: right;">Page 196</p> <p>1 the 5th and she had the bad flash drives, okay? 2 That's when I went to the next door neighbor, 3 just to stick it in to see if it was alive or 4 not. He didn't see anything, because there was 5 nothing to see, and he couldn't have seen 6 anything even if he had. So that's exactly what 7 happened. 8 Q. Turning to Eastern 211. You wrote, 9 "the agreement for 3 months is correct." Do you 10 see that at the top of the page? 11 A. Yes. 12 Q. What did you mean by that? 13 A. Because the contract was for three 14 months, was for 90 days. January, we have 15 allowed 15 fish. Ten fish each for February and 16 March; for some reason, that's sort of cut off. 17 Oh, here it is, March. "We will determine the 18 subsequent monthly costs obviously by the next 19 set of numbers of fish in the tank." 20 Q. So what would happen after 90 days? 21 A. We were all going to regroup and figure 22 out how much – how many of the fish had – were 23 useful information for him and how many fish had 24 been tossed out, and then he was going to be 25 adding more fish. He said up to 4,000 fish,</p>
<p style="text-align: right;">Page 195</p> <p>1 Q. Did you tell Yvette that they shouldn't 2 have sent the wire from where they had? 3 A. Well, I – later on I did. Lianchao 4 told her, like, what were you thinking? 5 Q. So you had a conversation with Lianchao 6 about the wire – 7 A. Later. 8 Q. – being done properly? 9 A. Later, later. Like, two weeks later. 10 Q. And you understood that Lianchao had 11 conveyed that to – 12 A. Yes. 13 Q. – Ms. Wang? 14 A. Well, to Guo. He played those two back 15 and forth. He played Yvette against Lianchao, 16 Lianchao against Yvette. 17 Q. Turning to Eastern 208. It says, "We 18 hope you will have the docs as discussed for the 19 15 fish with you?" 20 A. That's right. 21 Q. And so what was – was that the – you 22 already understood what that was, that was – 23 A. That was this. 24 Q. – Exhibit 7? 25 A. Yes. And that's when she arrived on</p>	<p style="text-align: right;">Page 197</p> <p>1 total. 2 Q. Would it have been possible to do 3 investigations on 4,000 fish? 4 A. Not all at once, and he knew that. He 5 agreed that would be ridiculous. It was supposed 6 to be a three-year contract. 7 Q. But it was a – you're saying it was a 8 three-month contract? 9 A. It was three months, to be done for a 10 year, if you look at the contract itself, and 11 then, after that time, it was a three-year 12 contract. If you recall, on the last page of the 13 agreement, "duration of this contract shall be 14 enforced for three years from the date of 15 signing." That's what we had initially planned 16 on. We certainly had initially planned on the 17 first three months. 18 Q. On Eastern 213, do you see where it 19 says, "can you please send the contract here? I 20 get the right person to do. Thank you?" 21 A. That was weird. 22 Q. What did you understand that request to 23 mean? 24 A. Well, we certainly weren't going to 25 send it through any kind of email thing. So she</p>

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<p style="text-align: right;">Page 198</p> <p>1 had to sign it – she had to come – she signed 2 it on the 6th. So she says, "please send the 3 contract here I get the right person to do." I 4 don't know what that meant. "There is of course 5 no impasse here. I work with several people, M 6 is one of them saying for this project he is not 7 only boss." Well, that was news to us. 8 Q. I'm just asking about why you didn't 9 send the contract when it was requested there? 10 A. Because we still didn't have – oh, 11 dear lord. We still didn't have the flash 12 drives. This was the 5th. We didn't get the 13 proper flash drives with the folder until the 14 8th, Monday the 8th. So what could we do, except 15 take – except have her sign the contract. They 16 had already sent the money, we all had agreed to 17 the terms. She needed to sign the contract. 18 Then I went to New York to get a flash drive 19 that, God willing, would work, out of the three. 20 And we tried to explain to them that 21 their systems were corrupted. If she was 22 downloading, or he was downloading the stuff from 23 his own computer, he was getting – he was being 24 hacked into by the Chinese himself. Because you 25 can't make this stuff up on the – on the</p>	<p style="text-align: right;">Page 200</p> <p>1 it" 2 A. Correct. And New York was equally 3 adamant about it. That was Guo. 4 Q. I was going to say, who's New York? 5 A. That was Guo. 6 Q. And L is Lianchao? 7 A. Yes. 8 Q. And who's M? 9 A. Michael, Mike, Dr. Waller. 10 Q. Turning to Eastern 19. You wrote, 11 "Thank you. I will look forward to seeing you 12 tomorrow here. You can make whatever minor 13 changes here on my laptop and then print off two 14 copies?" 15 A. Correct. That meant print off two 16 copies of the agreement. 17 Q. Right. What were the changes or issues 18 that you were thinking of at that time? 19 A. Whatever changes we made that were – 20 she would – I mean, whatever was made was made, 21 and we agreed to in the document. I don't 22 remember. They were minor. 23 Q. You said, "we've already lost a week"? 24 A. That's right. 25 Q. What did you mean by that?</p>
<p style="text-align: right;">Page 199</p> <p>1 corrupted files. 2 Q. But before January 6th, you weren't 3 aware of any corruption or hacking issues, were 4 you? 5 A. Yes, absolutely. 6 Q. How were you supposedly aware of that? 7 A. Well, because we had a corrupt – when 8 we were even sitting there, I think at one point 9 Guo had a USB key and he was putting it into his 10 own computer, and it was acting up, and he took 11 it out and he said, I can't – I can't do the 12 file here. 13 Q. When was that? 14 A. It was before – this must have been 15 sometime in mid-Jan – mid-December, whenever we 16 were up there meeting with him, he had an issue 17 with the computer. And Mike told him, he said, 18 you know, you got – you got issues here that 19 have nothing to do with us. 20 Q. You wrote, "As you know, the agreement 21 can only be reviewed and cannot be sent by email 22 for the purpose of absolute security"? 23 A. Correct. 24 Q. It says, "Other than New York, L, M and 25 myself and you, we are the only ones privy to</p>	<p style="text-align: right;">Page 201</p> <p>1 A. If we didn't have this, we couldn't 2 start. If we didn't have the entire file, we 3 couldn't start, could we? Because we had no 4 information to go on. 5 Q. Did you understand that time was an 6 important factor? 7 MR. SCHMIDT: Objection. 8 A. Of course it was an important factor. 9 Q. Why was that? 10 A. Because we were prepared to go, but, 11 due to their corrupt files, we couldn't start 12 until we got the full document that was not 13 corrupted. 14 Q. Right. But this is January 5th, right, 15 this email message or Signal message? 16 A. Yes. 17 Q. And so I'm just asking, you hadn't 18 seen – or you hadn't received the files that had 19 any alleged issues with it in terms of – 20 A. Yes. She came on the 5th, she put the 21 files in, they didn't work, they were corrupted. 22 I then had to get on the train and come up here 23 on the Monday morning, the 8th, okay, to get the 24 USB file that was clean. Out of the three, there 25 was only one that was clean.</p>

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<p style="text-align: right;">Page 202</p> <p>1 Q. I thought –</p> <p>2 A. So we couldn't start.</p> <p>3 Q. – the agreement was signed on</p> <p>4 January 6th, though?</p> <p>5 A. Yes, but we couldn't start until we had</p> <p>6 clean files. She thought she had clean files,</p> <p>7 and she didn't have them on the 5th and 6th, did</p> <p>8 she?</p> <p>9 Q. I don't understand how you thought you</p> <p>10 lost a week, if you hadn't even signed an</p> <p>11 agreement yet?</p> <p>12 A. Because the funds had been sent, right,</p> <p>13 on the 29th, and let's call it the 2nd that we</p> <p>14 had received them, and, in fact, they didn't</p> <p>15 really get into our account until the 4th because</p> <p>16 of the holiday weekend and so forth. And then</p> <p>17 Citibank called to say, are – is this your –</p> <p>18 are these – you expecting this? I said yes. So</p> <p>19 they were fine. But they were not available –</p> <p>20 there's something known as a federal reserve,</p> <p>21 that stops large payments. Anything over, like,</p> <p>22 \$300,000 gets flagged. So we had to verify that</p> <p>23 this was a contract.</p> <p>24 Q. Let's go to Eastern 223. Do you</p> <p>25 remember Ms. Wang sending you a Signal message</p>	<p style="text-align: right;">Page 204</p> <p>1 Q. The financial, forensic research,</p> <p>2 current tracking and social media?</p> <p>3 A. There were not reports, other than</p> <p>4 flash drive information, which we've already</p> <p>5 answered that.</p> <p>6 Q. Of course we have, yes, but they are</p> <p>7 referred to as reports in the agreement, so</p> <p>8 that's why I'm using that term.</p> <p>9 A. They're flash drives.</p> <p>10 Q. Okay.</p> <p>11 A. They're not written.</p> <p>12 Q. And the teams that are already</p> <p>13 dispatched, how many teams were dispatched as of</p> <p>14 January 9th?</p> <p>15 A. Well, One was in the process of</p> <p>16 being – Number One was being in the process of</p> <p>17 being dispatched because it was an overseas</p> <p>18 person that was – that Mike had to coordinate</p> <p>19 with, and we had to get – we had to get numerous</p> <p>20 computers and different kinds of phones and</p> <p>21 burner phones and everything. It's a huge</p> <p>22 operation.</p> <p>23 Q. Were you involved at all in the</p> <p>24 logistics of that operation?</p> <p>25 A. No. Mike was.</p>
<p style="text-align: right;">Page 203</p> <p>1 asking to accommodate two small fish?</p> <p>2 A. Two more small fish. So it would have</p> <p>3 made 17 fish, okay? No. The answer was</p> <p>4 absolutely no.</p> <p>5 Q. Well, let's just go one at a time.</p> <p>6 MR. SCHMIDT: Do you remember receiving</p> <p>7 the message or –</p> <p>8 THE WITNESS: Yes.</p> <p>9 MR. SCHMIDT: -- or --</p> <p>10 THE WITNESS: Yes.</p> <p>11 MR. SCHMIDT: Okay.</p> <p>12 Q. Okay. And what was your response?</p> <p>13 A. No. Absolutely no.</p> <p>14 Q. And why did you have that firm</p> <p>15 response?</p> <p>16 A. Because we've already given you five</p> <p>17 extra fish, if you will read my response.</p> <p>18 Q. They did have to pay for those 15 fish,</p> <p>19 though, right?</p> <p>20 A. Not really.</p> <p>21 Q. Okay.</p> <p>22 A. They didn't. They were five free fish.</p> <p>23 Q. And they were entitled to all three</p> <p>24 reports on those 15 fish?</p> <p>25 A. What reports?</p>	<p style="text-align: right;">Page 205</p> <p>1 Q. So he was involved in procuring the</p> <p>2 phones and computers and things of that nature –</p> <p>3 A. No.</p> <p>4 Q. – for Team 1?</p> <p>5 A. Team 1 did it.</p> <p>6 Q. Okay. What other teams were dispatched</p> <p>7 as of January 9th, other than Team 1?</p> <p>8 A. That was the only "team team" outside</p> <p>9 of the United States. I was collecting or I was</p> <p>10 getting ready to begin to collect information</p> <p>11 from my own channels, which was not labeled as a</p> <p>12 team.</p> <p>13 Q. Right. I'm just trying to understand</p> <p>14 your message on Eastern 224. At the end it says,</p> <p>15 "Teams are already dispatched and beginning their</p> <p>16 trip"?</p> <p>17 A. That meant Mike and the person that was</p> <p>18 hiring the people to manage this particular</p> <p>19 account. It wasn't just one person with one</p> <p>20 computer. There were at least ten.</p> <p>21 Q. Ten individuals?</p> <p>22 A. Ten individuals.</p> <p>23 Q. On Team 1?</p> <p>24 A. On Team 1, at least.</p> <p>25 Q. And how did you know how many members</p>

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<p style="text-align: right;">Page 206</p> <p>1 of Team 1 there were?</p> <p>2 A. Because I was told that by Mike.</p> <p>3 That's all I know. I don't know who they were, I</p> <p>4 don't know their names. I don't know anything</p> <p>5 about it. We compartmentalized it.</p> <p>6 Q. Right. So you don't have any – you</p> <p>7 played no role in assembling Team 1 or managing</p> <p>8 its actions?</p> <p>9 A. My expertise, young man, is –</p> <p>10 Q. I'm not that young, but go on.</p> <p>11 A. – is 45 years of working in</p> <p>12 specialized areas, and I understand how to</p> <p>13 assemble the right people to do, God knows, the</p> <p>14 right job. And Mike was one of the people who</p> <p>15 did dispatch and organize Team 1.</p> <p>16 Q. Right. So you weren't involved with</p> <p>17 managing or assembling –</p> <p>18 A. Not on a –</p> <p>19 Q. – Team 1?</p> <p>20 A. – day-to-day because we were</p> <p>21 compartmentalizing it.</p> <p>22 Q. That's fine. You can – I'm just</p> <p>23 asking for an answer.</p> <p>24 A. I'm giving you one.</p> <p>25 Q. Thank you.</p>	<p style="text-align: right;">Page 208</p> <p>1 understand. What was it between the 8th and the</p> <p>2 16th that caused a delay?</p> <p>3 A. Well, we didn't have the equipment to</p> <p>4 begin to do what we said we wanted to be able to</p> <p>5 do because of all of these weirdo delays with the</p> <p>6 flash drives.</p> <p>7 Q. In other words –</p> <p>8 A. They were corrupted flash drives,</p> <p>9 right?</p> <p>10 Q. In other words, you didn't have the</p> <p>11 equipment to do the research on, let's just say,</p> <p>12 January 1, you had to go and buy it –</p> <p>13 A. That's correct.</p> <p>14 Q. – after the agreement was signed?</p> <p>15 A. That's correct. And why would that be?</p> <p>16 Q. I'll be asking the questions.</p> <p>17 A. I know –</p> <p>18 MR. SCHMIDT: Don't ask questions.</p> <p>19 A. – but, I mean, this is absurd.</p> <p>20 MR. GRENDI: Why don't we take a little</p> <p>21 break.</p> <p>22 THE WITNESS: Yeah, I think we need a</p> <p>23 little break.</p> <p>24 MR. SCHMIDT: That's fine.</p> <p>25 THE WITNESS: You just don't get it.</p>
<p style="text-align: right;">Page 207</p> <p>1 A. You're welcome.</p> <p>2 Q. What was the issue that – if we go to</p> <p>3 Eastern 227, that caused a delay of eight days?</p> <p>4 A. Okay, you have to take a calendar out</p> <p>5 and look at the calendar for January. It's easy</p> <p>6 to see. The 8th, Monday the 8th was when we</p> <p>7 finally got a decent copy of this, right</p> <p>8 (indicating)?</p> <p>9 Q. Exhibit 7?</p> <p>10 A. Yes, Exhibit 7.</p> <p>11 Q. Sure.</p> <p>12 A. That week, Mike and the person from</p> <p>13 Team 1 were coordinating how they were going to</p> <p>14 get the – the equipment together. They had to</p> <p>15 drive to three different countries to get the</p> <p>16 information – I mean, to get the equipment, so</p> <p>17 they wouldn't be tracked.</p> <p>18 The IP numbers and everything else</p> <p>19 would not be tracked. These would be, quote,</p> <p>20 technically, virgin computers, virgin phones,</p> <p>21 these would be burner phones. All of these</p> <p>22 communications had to be coordinated. So from</p> <p>23 the 8th of January to the 16th, I believe, makes</p> <p>24 eight days.</p> <p>25 Q. And that's what I'm trying to</p>	<p style="text-align: right;">Page 209</p> <p>1 THE VIDEOGRAPHER: Off the record at</p> <p>2 3:25.</p> <p>3 (Whereupon, a short recess was taken.)</p> <p>4 THE VIDEOGRAPHER: Back on the record</p> <p>5 at 3:32.</p> <p>6 Q. Still on Wallop 10, Bates number</p> <p>7 Eastern 227. Do you see where you wrote, "We</p> <p>8 have some new exotic fish options to discuss</p> <p>9 too"?</p> <p>10 A. Yes.</p> <p>11 Q. What did you mean by that?</p> <p>12 A. I think Mike and I had come up with</p> <p>13 some information that would have been interesting</p> <p>14 for Guo.</p> <p>15 Q. Why did you describe it as a fish</p> <p>16 option? What does that –</p> <p>17 A. I think exotic was the key word there,</p> <p>18 because it was outside of the parameter.</p> <p>19 Q. What do you mean by parameter? I just</p> <p>20 want to understand –</p> <p>21 A. Outside of the – the 15 fish. It was</p> <p>22 additional information that we thought he might</p> <p>23 find useful. It had nothing to do with the 15</p> <p>24 fish.</p> <p>25 Q. What was that information?</p>

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<p style="text-align: right;">Page 210</p> <p>1 A. I can't remember right now. I'm not 2 being – trying to be avoiding you. I just don't 3 remember. 4 Q. That's okay. 5 A. But he was happy with it, whatever it 6 was. 7 Q. Oh, so you did describe it to him? 8 A. Oh, yeah, I told him. I just – Mike 9 might remember what it was. 10 Q. And it says here on the following page, 11 228, "We expect to have new fishing info for the 12 captain later next week?" 13 A. Yes. That would have been – that 14 would have been the additional information over 15 and above the 15. 16 Q. Oh, that's a reference to the exotic 17 fish option? 18 A. Yeah. It's in the same text. 19 Q. There's a reference below to crispy 20 duck dumpling spinach? 21 A. Yes. 22 Q. Do you recall having a meal of that 23 nature with Mr. Guo? 24 A. I do. 25 Q. When was that?</p>	<p style="text-align: right;">Page 212</p> <p>1 ten fish, we had ten people. 2 Q. Was each team member assigned – each 3 of the ten individuals on Team 1 assigned one 4 fish? 5 A. I believe that was the case, but I do 6 not know because, again, I wasn't a party to it. 7 But that makes sense, doesn't it? 8 Q. Were there any other problems, other 9 than just the – the large volume of 15 fish as 10 opposed to ten? 11 MR. SCHMIDT: Objection, but go ahead. 12 A. The initial change at the last minute, 13 asking for 15 instead of ten, sort of gummed up 14 the works. So, yes, and he actually understood 15 that when we finally got to talk to him about it. 16 Q. I mean, at this time, did you 17 understand that the client wanted the information 18 on a very prompt basis? 19 A. No. There was no deadline given to us. 20 MR. SCHMIDT: You answered. 21 THE WITNESS: I'm sorry. 22 Q. Let's go to Eastern 234. This is a 23 message on January 17, 2018. You said, "Please 24 inform New York re above, we expect to have a 25 fairly full net." Do you see that comment?</p>
<p style="text-align: right;">Page 211</p> <p>1 A. In December or early January. 2 Q. That was one of the first meetings? 3 A. Yeah. So it must have been December. 4 I just can't eat much, and sometimes they have 5 massive amounts. 6 Q. You were just trying to kind of stave 7 off the embarrassment of having to turn down all 8 the stuff he was trying to give? 9 A. Well, yes and yes. He – he was not 10 trying to give. They often have lots and lots 11 and lots and lots of food at Chinese lunches, and 12 he's often – he was often trying to give you 13 more food, and I can't eat that much. So, I just 14 can't digest anything more than a little bit at a 15 time. 16 Q. And turning to Eastern 230. Do you see 17 where you wrote, "no. We expect to have results 18 the following week due to the problems about 19 putting multiple fish in late." Do you see that? 20 A. Correct. 21 Q. What were the problems due to putting 22 multiple fish in late? 23 A. Well, when you add 33 percent more to 24 the – to the equation, it – it – it bogs down 25 the ten research people we had working. We had</p>	<p style="text-align: right;">Page 213</p> <p>1 A. Yes. 2 Q. What did you mean by a fairly full net? 3 A. We were told that we had some good, 4 useful information from Team 1, but then that was 5 told to Mike. 6 Q. Did you have any reason to think there 7 would be a fairly full net based on the 8 information your contacts were bringing in? 9 A. I didn't know. I just – I just 10 presumed that the – I guess the word presumed is 11 the wrong word, but I believed that if they had 12 new information, that it was going to be useful, 13 and that he would be pleased with that. 14 Q. So had you spoken to Dr. Waller at or 15 around this time about the progress of Team 1? 16 A. I never saw – you have to understand, 17 I never saw any of these USB keys or flash 18 drives, or the – the data that was within them; 19 again, compartmentalizing. 20 Q. I understand that. What I was asking 21 was, did you talk to Dr. Waller about – 22 A. No. 23 Q. – Team One's progress? 24 A. No, no. 25 Q. So this –</p>

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<p style="text-align: right;">Page 214</p> <p>1 A. Not in depth.</p> <p>2 Q. This comment about, we expect to have a</p> <p>3 fairly full net, was just your assumption?</p> <p>4 A. Yes.</p> <p>5 Q. And at that time, you didn't know if</p> <p>6 Team 1 was finding any information or good</p> <p>7 information, or anything of that nature?</p> <p>8 A. We were told that they were finding</p> <p>9 information.</p> <p>10 Q. So, again, how did you get that</p> <p>11 information if you didn't get it from Dr. Waller?</p> <p>12 A. He told me, but I've said to you that I</p> <p>13 only spoke a little bit to Michael. I did not</p> <p>14 know all of the details of that. He said that he</p> <p>15 believed he had some good information that was</p> <p>16 going to make New York, New York, as we called</p> <p>17 him, happy.</p> <p>18 Q. I got it. Going to Eastern 235. At</p> <p>19 the bottom of the page you wrote, "We have to</p> <p>20 finish shopping and we'll find a very nice</p> <p>21 present for." That's all it has there.</p> <p>22 What did you mean by finish shopping,</p> <p>23 if you recall?</p> <p>24 A. Well, we – we're – let's see. This</p> <p>25 was ten days into the contract, essentially. We</p>	<p style="text-align: right;">Page 216</p> <p>1 meeting, if you recall?</p> <p>2 A. We had some information, and I can't</p> <p>3 remember if Mike had gotten – I don't think he'd</p> <p>4 gotten the flash drive at that point, that</p> <p>5 particular flash drive, but we were giving him a</p> <p>6 verbal update on certain people within the –</p> <p>7 within the file, Exhibit 7.</p> <p>8 Q. And you said before that you were</p> <p>9 working around the clock?</p> <p>10 A. Yes. They were.</p> <p>11 Q. But you weren't. You mean the team was</p> <p>12 or – I just want to be precise here.</p> <p>13 A. Well, I'm human. I don't work 24/7.</p> <p>14 Q. I didn't mean that, obviously. But you</p> <p>15 said you'd been working weekends on this; is that</p> <p>16 fair to say?</p> <p>17 A. All of us were working, often.</p> <p>18 Whenever we found a lead, we'd go after it.</p> <p>19 Q. And is that just standard procedure for</p> <p>20 –</p> <p>21 A. Yes.</p> <p>22 Q. – and engagement of this nature?</p> <p>23 A. Yes.</p> <p>24 MR. SCHMIDT: Just let him finish the</p> <p>25 question.</p>
<p style="text-align: right;">Page 215</p> <p>1 were working through weekends, so we were trying</p> <p>2 to retrieve information, according to Mike, that</p> <p>3 was – that we felt that was going to be very</p> <p>4 useful for him. Again, I did not know what those</p> <p>5 specifics were.</p> <p>6 Q. But the reference to shopping is the</p> <p>7 collection of information?</p> <p>8 A. The collection, yes.</p> <p>9 Q. And a present would be, what, useful</p> <p>10 information?</p> <p>11 A. Useful information.</p> <p>12 Q. And you said, "we'll be there on the</p> <p>13 25th." Was that for a meeting that you were</p> <p>14 planning with Mr. Guo and Lianchao and Yvette?</p> <p>15 A. Yeah, it was the 25th or the 26th. I</p> <p>16 thought it was the 26th.</p> <p>17 Q. If you turn to Eastern 238.</p> <p>18 A. Yeah.</p> <p>19 Q. You see it says, "okay we'll do lunch</p> <p>20 for the 26th"?</p> <p>21 A. Right.</p> <p>22 Q. And is that your recollection, that the</p> <p>23 meeting was –</p> <p>24 A. Yes.</p> <p>25 Q. And what – what happened at that</p>	<p style="text-align: right;">Page 217</p> <p>1 MR. GRENDI: That's okay.</p> <p>2 A. Yes.</p> <p>3 Q. And does that schedule ever let up</p> <p>4 during an engagement or is it just typical for</p> <p>5 the beginning of an investigatory research</p> <p>6 project?</p> <p>7 A. Well, something that was this intense,</p> <p>8 where you had an increase – mentally, you'd</p> <p>9 already sort of planned out in the contract for</p> <p>10 ten. So you get a 33 percent increase. So you</p> <p>11 have to sort of shift the – the process, adjust</p> <p>12 the process so that you can continue to keep</p> <p>13 going in.</p> <p>14 Again, I have to tell you, repeatedly,</p> <p>15 how many names were fake, how many – how many</p> <p>16 bits of information and addresses were fake, how</p> <p>17 many rabbit holes these guys had to go down to –</p> <p>18 to prove that there were not – the information</p> <p>19 that Guo had been given for \$250 million, a lot</p> <p>20 of it was rubbish.</p> <p>21 Q. Just going back to that meeting on the</p> <p>22 26th of January. Was any information presented</p> <p>23 to the client?</p> <p>24 A. I think Mike did, yes, verbally.</p> <p>25 Verbally. We sat there and listened.</p>

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<p style="text-align: right;">Page 218</p> <p>1 Q. Did you personally make any 2 presentation about the research at that 3 January 26th meeting? 4 A. I wouldn't call it a presentation. We 5 had an open discussion about the – the content 6 and the fact that we'd only been in it ten days, 7 and the complications arising from expecting – 8 or Guo expecting to have a full – or a flash 9 drive in ten days was unreasonable. 10 Q. So was it at that time when it occurred 11 to you that there was some immediacy to this 12 project? 13 MR. SCHMIDT: Objection. 14 A. Not more so than usual. He never 15 mentioned any drop dead date or anything like 16 that. 17 Q. But did you get the impression at that 18 January 26th meeting that Mr. Guo wanted the 19 information as soon as possible? 20 A. He always wanted it as soon as 21 possible. 22 Q. From the very beginning? 23 A. From the very beginning. 24 Q. And is that part of the reason why you 25 and your team were working around the clock or on</p>	<p style="text-align: right;">Page 220</p> <p>1 Q. So why was it that you and Dr. Waller 2 were apologizing? 3 A. Actually, Mike was the one who was 4 apologizing, and he was, I think – I spent time 5 in Asia. You – you – you don't allow your 6 Asian friends to lose face. And so it was really 7 important for Mike and for me not to have him 8 lose face or be embarrassed by the fact that he 9 didn't have all the information, for whatever 10 reason, that he needed to have at that lunch, and 11 that's when – that was on the 26th, the lunch, 12 when we discussed the delay. 13 Q. Did you or Dr. Waller say to Mr. Guo, 14 what's the big hurry here? What's the rush? 15 A. I don't recall that. 16 Q. You don't recall saying that? 17 A. No, I don't recall either one of us 18 asking him. He never told us why. 19 Q. But you never asked? 20 A. Well, the client was the one who should 21 have told us if there was a reason that we needed 22 to be – to have something by X date. 23 Q. And so going back to this apology. 24 What was offered, if anything, as an apology to 25 the present client?</p>
<p style="text-align: right;">Page 219</p> <p>1 weekends? 2 A. Yes. We wanted to make sure that the 3 client was happy and that we could find what we 4 needed to retrieve. 5 Q. Was there any kind of internal 6 miscommunication at Strategic Vision that delayed 7 the progress of the investigation? 8 MR. SCHMIDT: Objection. 9 A. Not that I'm aware of. 10 Q. You don't recall any problems or errors 11 that were made by Strategic Vision's team that 12 delayed the progress of the research? 13 A. To my knowledge, we never made any 14 errors. We were going out of our way not to make 15 errors, based on the fact that we had fake 16 information on a number of the files that we've 17 been given. 18 Q. Did you ever tell Mr. Guo or Yvette 19 Wang or Lianchao Han that there was an internal 20 miscommunication that delayed the start of the 21 research? 22 A. Not – not to my recollection. I mean, 23 we apologized that we hadn't been able to 24 retrieve it as quickly as he would have liked it, 25 but ten days is asking a lot.</p>	<p style="text-align: right;">Page 221</p> <p>1 A. To Guo, Mike just said, I'm really very 2 sorry, it is not our standard procedure to ever 3 have an unhappy client. We certainly will do 4 everything we can to make sure that he – that 5 you, you know, Miles, are happy with what we're 6 going to continue trying to retrieve. 7 And then Michael, again, explained to 8 him the layers of how these things are found. 9 You can't – you can't bring up legitimate 10 information if you have been given fake names, 11 fake addresses, fake family relationships. It's 12 like looking into a dark closet and there's 13 nothing there, because you can't identify 14 anything if you have no legitimate names to go 15 on. 16 The Chinese deliberately will change 17 the names of their daughters, cousins, uncles, 18 brothers; there's no Ancestry.com that you can go 19 to to figure it out. 20 Q. And so, was it at this meeting that you 21 conveyed to Mr. Guo and Lianchao and – well, I'm 22 sorry, who was present at this meeting? 23 A. I think Lianchao was there. 24 Q. Okay. 25 A. No, no, no, I take it back. I take it</p>

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<p style="text-align: right;">Page 222</p> <p>1 back. On the 26th, Yvette was there. Yvette was 2 there, Mike and I were there, and – and Guo was 3 there. 4 Q. So was – was it at this January 26th 5 meeting that you conveyed for the first time 6 that, hey, some of these names that you gave us, 7 they're fake people? 8 A. No. 9 Q. When was that? 10 A. We had already told Lianchao and Yvette 11 that there were some fake names and fake leads in 12 here. 13 Q. And when was that? 14 A. Whenever we saw them. And, you know, 15 since Lianchao lives in Washington, I was able to 16 tell him face-to-face, not on the telephone; we 17 had very limited, you know, whatever, Signal 18 messages or anything like that, so it was always 19 face-to-face. 20 Q. And did Strategic Vision offer to give 21 ten days of – 22 A. We did. 23 Q. – free service at that time? 24 A. And we did. 25 Q. And was that just a client relations</p>	<p style="text-align: right;">Page 224</p> <p>1 you were there? 2 A. Guo, and probably Lian – Lianchao, I 3 think, might have been there at that point. 4 Q. Was Yvette there? 5 A. I think that was one of the times he 6 sent her out of the room. She was there, but he 7 sent her out. 8 Q. What was the takeaway from the 9 January 26, 2018 report; what was going to happen 10 next? 11 A. We were good. And he said fine, just 12 keep digging. I don't care what you have to do. 13 Go into every file you can find. Be aggressive. 14 Don't hold back. 15 Mike explained to him that, you know, 16 there were certain parameters about what you 17 could go into legally, and that we were not 18 willing to do anything illegal, and we never 19 have, we were not going to start with him. 20 So, at the end of it, I had brought a 21 little present to give to Guo, my little personal 22 collection of small antique Buddhas, and I gave 23 it to – I was giving it to him in the beginning, 24 the morning. I said, this is something that I've 25 had for a long time, it means a lot to me, I'd</p>
<p style="text-align: right;">Page 223</p> <p>1 offer – 2 A. Yes. 3 Q. – it wasn't because there was any kind 4 of problem? 5 A. I wouldn't call it a problem. The 6 problem ended up here (indicating). This was the 7 problem, with the initial Exhibit 7. That was 8 the problem that – that stymied us, plus their 9 asking for the additional five fish, which we 10 agreed to do to help them out. 11 Q. So Strategic Vision didn't see anything 12 wrong with how it was conducting itself. There 13 was a delay because of what you just said, some 14 of the names were fake? 15 MR. SCHMIDT: Objection. 16 A. Yes. 17 Q. Was this discussion on January 26, 2018 18 the first oral report presented to Mr. Guo and 19 Yvette? 20 A. No. 21 Q. What was the previous? 22 A. Somewhere around the 16th, or something 23 like that, the 15th, 16th. I don't have a 24 calendar, so I don't know. 25 Q. And who did you make that report to, if</p>	<p style="text-align: right;">Page 225</p> <p>1 like you to have it. He refused to accept it. 2 And then he turned around to Mike and 3 gave Mike huge bear hugs, and then he gave me 4 close to a bear hug, but not quite; he gave Mike 5 a much bigger bear hug, slapped him on his back, 6 and said, you're my friend, I know we're going to 7 get this done, and everything is going to be 8 fine, and we just have to keep working on it, and 9 so forth. So everything was fine when we left. 10 Q. Did you understand that Mr. Guo wanted 11 information right away after that meeting? 12 A. He never – he always wanted 13 information right away, but he never had a 14 deadline, like, I have to have it by the 5th of 15 March or the 3rd of April, or whatever. We 16 always felt pressured to get the information to 17 him. 18 Q. So you don't recall Dr. Waller flying 19 off to Europe right after that meeting? 20 A. Of course I do. He went to get another 21 USB, another flash drive. 22 Q. And why did he do that at that time? 23 A. Because the client wanted to have the 24 latest, you know, chapter, I suppose. 25 Q. So did Mr. Guo ask for a flash drive at</p>

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<p style="text-align: right;">Page 226</p> <p>1 that January 26th meeting?</p> <p>2 A. He asked – he said to Mike, I want you</p> <p>3 to go get whatever it is, go get it and bring it</p> <p>4 back. Mike did that twice, at least.</p> <p>5 Q. And Mike did, in fact, fly off to</p> <p>6 Europe –</p> <p>7 A. Yep.</p> <p>8 Q. – right after that meeting?</p> <p>9 A. Yep. Pretty much.</p> <p>10 MR. GRENDI: Let's go to 11.</p> <p>11 (Wallop Exhibit 11, Background Report</p> <p>12 on Qing Yao, marked for identification.)</p> <p>13 Q. Ms. Wallop, do you recognize this</p> <p>14 document?</p> <p>15 A. Actually, I do not. I have never seen</p> <p>16 it until we did Yvette's, whatever it was,</p> <p>17 deposition the other day. I've never seen it.</p> <p>18 Q. Have you ever seen a report like it –</p> <p>19 A. No.</p> <p>20 Q. – a background report like this?</p> <p>21 A. No.</p> <p>22 Q. Do you have any idea where this</p> <p>23 document came from?</p> <p>24 A. I think it came from Mike and Team 1.</p> <p>25 That was my understanding.</p>	<p style="text-align: right;">Page 228</p> <p>1 Yvette at the train station, as I understand it.</p> <p>2 And then there was another guy from Guo's office</p> <p>3 or something, who's yet to be identified. But I</p> <p>4 don't know who he was.</p> <p>5 Q. Did there ever come a point in time</p> <p>6 when you talked to Dr. Waller about Mr. Guo or</p> <p>7 Yvette being disappointed with the 80-gigabyte</p> <p>8 flash drive, or USB drive?</p> <p>9 A. No.</p> <p>10 Q. You never discussed it?</p> <p>11 A. I never knew about it, because nobody</p> <p>12 told me what was on the drive, so I didn't know</p> <p>13 what was on the drive. I think Mike had hoped</p> <p>14 that there would probably be more on the drive,</p> <p>15 but that's all I knew based upon what he told me.</p> <p>16 Q. When did you get the idea that Mr. Guo</p> <p>17 was disappointed with the research?</p> <p>18 A. We never had any inkling until the</p> <p>19 lawsuit was filed.</p> <p>20 MR. GRENDI: Let's do 12.</p> <p>21 (Wallop Exhibit 12, Signal message</p> <p>22 thread, marked for identification.)</p> <p>23 A. I might correct that, because my memory</p> <p>24 is bad. We did know from Lianchao that he was</p> <p>25 not happy.</p>
<p style="text-align: right;">Page 227</p> <p>1 Q. But the first time you saw it was at</p> <p>2 Ms. Wang's deposition?</p> <p>3 A. Yes.</p> <p>4 Q. Do you know if Dr. Waller delivered an</p> <p>5 80-gigabyte flash drive to Yvette Wang on or</p> <p>6 about January 30th?</p> <p>7 A. Yes, I do know.</p> <p>8 Q. How do you know about that?</p> <p>9 A. He told me.</p> <p>10 Q. And after that flash drive was</p> <p>11 delivered, what happened?</p> <p>12 A. I don't know. I know that he delivered</p> <p>13 it to her in the train station. He had literally</p> <p>14 just come back from Ireland, having – having</p> <p>15 flown 24 hours round trip, I think. And he – he</p> <p>16 also didn't know exactly what was on it. So I</p> <p>17 don't know what was on it because I never saw it.</p> <p>18 Q. What was the response to the</p> <p>19 80-gigabyte flash drive from Mr. Guo?</p> <p>20 A. I don't know.</p> <p>21 Q. You never talked to him about it?</p> <p>22 A. No.</p> <p>23 Q. Did you ever talk to Dr. Waller about</p> <p>24 the response to the 80-gigabyte flash drive?</p> <p>25 A. He – he didn't meet Guo. He met</p>	<p style="text-align: right;">Page 229</p> <p>1 Q. When did –</p> <p>2 A. I would say somewhere in February,</p> <p>3 early to mid-February. I said, well, that's</p> <p>4 silly, because we're – we're knocking our brains</p> <p>5 out.</p> <p>6 Q. Just turn to Eastern 225. Or I'm</p> <p>7 sorry, 255 of this document.</p> <p>8 And is Pyratz a code name that</p> <p>9 Dr. Waller would go by?</p> <p>10 A. Yeah, that's Mike's signal.</p> <p>11 Q. And do you see this message from Yvette</p> <p>12 Waller on Eastern 255?</p> <p>13 A. You mean Yvette Wang.</p> <p>14 Q. Oh, jeez. Thank you. Yvette Wang, of</p> <p>15 course. Sorry.</p> <p>16 A. I don't know. I never saw this. This</p> <p>17 is the first time I've seen it. But he's very</p> <p>18 good in explaining stuff.</p> <p>19 Q. Do you see Dr. Waller's response on</p> <p>20 Eastern 257?</p> <p>21 A. Yes. He was explaining whatever.</p> <p>22 Q. And so you and Dr. Waller never had any</p> <p>23 discussions about this Signal exchange –</p> <p>24 A. No.</p> <p>25 Q. – between Dr. Waller and Yvette Wang?</p>

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<p style="text-align: right;">Page 230</p> <p>1 A. No.</p> <p>2 Q. Let's go to Eastern 259. Do you see</p> <p>3 where Dr. Waller wrote, "our understanding was</p> <p>4 that the first 90 days would be for starting up</p> <p>5 and developing the data"?</p> <p>6 A. I see that.</p> <p>7 Q. Was that Strategic Vision's</p> <p>8 understanding as well or just Dr. Waller's?</p> <p>9 A. No, it was our mutual understanding</p> <p>10 between Guo and myself and Lianchao and Mike.</p> <p>11 Q. Do you see where it says, he wrote, "We</p> <p>12 did not understand that he expected actual data</p> <p>13 in the first days or weeks"?</p> <p>14 A. Correct.</p> <p>15 Q. Again, you never talked to Dr. Waller</p> <p>16 about this exchange after –</p> <p>17 A. Not about –</p> <p>18 Q. – it happened on the –</p> <p>19 A. – this exchange, no.</p> <p>20 Q. Did you ever discuss the substance of</p> <p>21 this exchange, or something akin to it, about the</p> <p>22 expectations of the client?</p> <p>23 A. Perhaps later that – when we were</p> <p>24 talking about what – what we had been able to</p> <p>25 retrieve so far, and how we had – let me just</p>	<p style="text-align: right;">Page 232</p> <p>1 Q. Right.</p> <p>2 A. Yvette was taken off the case in, as we</p> <p>3 understand it, beginning the 1st of February.</p> <p>4 And then she – she sent us an email saying she</p> <p>5 was no longer in it, that only to – to</p> <p>6 communicate with Lianchao.</p> <p>7 Q. Did Strategic Vision adjust its</p> <p>8 research approach based upon this request for</p> <p>9 more immediate results?</p> <p>10 A. No. In fact, we actually increased the</p> <p>11 pressure on Team 1, and then went and had a</p> <p>12 long – several meetings with potential Team 2,</p> <p>13 and that's another side of it.</p> <p>14 Q. Is that a company that goes by the</p> <p>15 acronym ASOG?</p> <p>16 A. Yes. In Dallas. Outside of Dallas.</p> <p>17 Q. And why was it that ASOG was contacted</p> <p>18 in connection with this research agreement?</p> <p>19 A. Because we had the option of being able</p> <p>20 to bring in whatever teams we felt were going to</p> <p>21 be additionally viable, and also on the domestic</p> <p>22 side of some of the things that we were bumping</p> <p>23 into, or Mike and his team were bumping into on</p> <p>24 the international side, which were not pretty.</p> <p>25 So, we were given the names of the</p>
<p style="text-align: right;">Page 231</p> <p>1 read this. How Mike had explained very</p> <p>2 patiently, very calmly, very slowly, whether it</p> <p>3 was with – or through Lianchao or through</p> <p>4 Yvette, how the process works.</p> <p>5 So, if Guo wanted to speed up and get</p> <p>6 everything really fast, then all the trap doors,</p> <p>7 all the doors that we had been able to open</p> <p>8 quietly, would be slammed shut. If Guo would</p> <p>9 just be patient and let us get into where we</p> <p>10 needed to go quietly, he was going to get an</p> <p>11 awful lot of information back.</p> <p>12 The irony is, that had he just relaxed</p> <p>13 and stayed on top of this, that is Guo, he would</p> <p>14 have had a huge amount of information three</p> <p>15 months a year in. Huge. We can't fix somebody's</p> <p>16 perception of how this is done. He was very</p> <p>17 impatient.</p> <p>18 Q. When did you understand that Mr. Guo</p> <p>19 was getting impatient?</p> <p>20 A. I guess around – well, certainly on</p> <p>21 the 26th, when we sort of had our lunch with him,</p> <p>22 and then – and then I think possibly through</p> <p>23 Lianchao; because, as I told you, we never had</p> <p>24 any direct contact with – with Guo. It was</p> <p>25 always through Lianchao or Yvette.</p>	<p style="text-align: right;">Page 233</p> <p>1 fellows who had been with NSA, DIA, whatever,</p> <p>2 in – in – in Dallas, and we went and met with</p> <p>3 them, and they told us – they looked at – we</p> <p>4 only gave them like a couple of names, we never</p> <p>5 gave them the whole file.</p> <p>6 And they looked at it, and then we went</p> <p>7 back about a week later maybe, it might even have</p> <p>8 been ten days later, a week later, and they were</p> <p>9 totally freaked out. They said, you can't touch</p> <p>10 any of these people or any of these names. We</p> <p>11 said, what are you talking about?</p> <p>12 That's when they said, these are all</p> <p>13 RPs. We will all go to jail if you start fooling</p> <p>14 around in their files.</p> <p>15 Q. So when did you first meet with ASOG,</p> <p>16 that meeting in Dallas you just described?</p> <p>17 A. Yeah, it would have been the beginning</p> <p>18 of February, I should think. Again, Mike has the</p> <p>19 date.</p> <p>20 Q. Is there any reason a second team</p> <p>21 wasn't assembled at the outset of the agreement?</p> <p>22 A. We did – because of the element of</p> <p>23 retrieval we had to do outside of the United</p> <p>24 States, because he wanted it so fast and so</p> <p>25 quickly and intensely, that that was the fastest,</p>

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<p style="text-align: right;">Page 234</p> <p>1 quickest way of getting into certain files had</p> <p>2 they not all – had some of them not been fake,</p> <p>3 then we would have had no – we wouldn't have</p> <p>4 gone to the second – second dimension.</p> <p>5 Q. And the decision to go with the second</p> <p>6 team, was that Strategic Vision's –</p> <p>7 A. Mine –</p> <p>8 Q. – decision or Dr. Waller's?</p> <p>9 A. Mine and Mike's, yeah.</p> <p>10 Q. Jointly?</p> <p>11 A. Jointly.</p> <p>12 Q. Okay.</p> <p>13 A. We both went down twice.</p> <p>14 Q. And you said RP. What does RP mean?</p> <p>15 A. Restricted persons.</p> <p>16 Q. And in your career in this</p> <p>17 investigatory field, have you encountered</p> <p>18 restricted persons before or –</p> <p>19 A. Yes and no. It's had different</p> <p>20 acronyms. Sometimes it's PP, protected persons.</p> <p>21 Sometimes it's RP. But it means that it is</p> <p>22 either under a watch list by the U.S. Government</p> <p>23 or it is a – or, let's just say a certain agency</p> <p>24 has tagged these individuals and is watching them</p> <p>25 themselves. So we cannot enter into those files</p>	<p style="text-align: right;">Page 236</p> <p>1 them the whole file. We only gave them like, I</p> <p>2 don't know, maybe four or five names.</p> <p>3 Q. Okay. But what I'm just trying to</p> <p>4 understand is –</p> <p>5 A. And I –</p> <p>6 Q. – and I know this sounds like a basic</p> <p>7 question –</p> <p>8 A. Right.</p> <p>9 Q. – and I apologize. But are all people</p> <p>10 restricted persons in intelligence files or</p> <p>11 government files?</p> <p>12 A. No.</p> <p>13 Q. Okay. So there are certain people –</p> <p>14 A. No, no, no, no, no. These were tagged.</p> <p>15 Q. Specially tagged?</p> <p>16 A. These were tagged. And I – again, you</p> <p>17 would have to ask Mike. I don't know if it was</p> <p>18 the whole file that was tagged or if it was just</p> <p>19 four or five names they ran through the system.</p> <p>20 Q. I see.</p> <p>21 A. But they were all tagged; flagged,</p> <p>22 tagged, whatever you want to call it.</p> <p>23 Q. So when did you convey to the client</p> <p>24 that there was this restricted persons</p> <p>25 designation on some of the fish?</p>
<p style="text-align: right;">Page 235</p> <p>1 at all in the U.S.</p> <p>2 Q. And these files you're talking about,</p> <p>3 are these files government files or what kind of</p> <p>4 files are they?</p> <p>5 A. Your Exhibit 7, these names, all of</p> <p>6 these names. We can't – we don't know, because</p> <p>7 we certainly were not peeking into those</p> <p>8 government files.</p> <p>9 Q. Oh, they're government files you're</p> <p>10 talking about?</p> <p>11 A. Yes. These are U.S. intelligence</p> <p>12 files.</p> <p>13 Q. I see. And sometimes those files are</p> <p>14 accessible, if they're not records protected –</p> <p>15 or, I'm sorry, restricted persons?</p> <p>16 A. It just depends on the jurisdiction of</p> <p>17 where you're looking into the file. We would</p> <p>18 never do anything that would be anti-U.S. law.</p> <p>19 And he was asking us to continue doing that, Guo</p> <p>20 was.</p> <p>21 Q. But just in terms of these people who</p> <p>22 you – ASOG told you were restricted persons.</p> <p>23 There are some people, obviously, that are not</p> <p>24 restricted persons, is that fair to say?</p> <p>25 A. I have no idea. Because we didn't give</p>	<p style="text-align: right;">Page 237</p> <p>1 A. We did that through Lianchao.</p> <p>2 Q. And when was that?</p> <p>3 A. Sometime in the middle of February, I</p> <p>4 think, by the time we had gotten – we had been</p> <p>5 down to – to Dallas.</p> <p>6 Q. And so you went to Dallas with</p> <p>7 Dr. Waller?</p> <p>8 A. Twice. Twice we went to see him.</p> <p>9 Twice. Or see them twice. The irony was, we</p> <p>10 then saw this group at a function in Washington,</p> <p>11 at an intel or security defense function several</p> <p>12 months later, and they said to us – they said to</p> <p>13 us, well, it's really weird, because they already</p> <p>14 had figured out it was Guo that was the client.</p> <p>15 We never told them who the client was.</p> <p>16 So they told – they – they said, well, they</p> <p>17 figured out it was Guo, and they said about a</p> <p>18 week or so after we had been down there the</p> <p>19 second time, that Guo had people go down to talk</p> <p>20 to them.</p> <p>21 And we never told anybody who they</p> <p>22 were. We didn't tell Lianchao who they were. We</p> <p>23 didn't tell anyone. This was just between Mike</p> <p>24 and me. So that was very weird.</p> <p>25 Q. Do you think that was just a</p>

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<p style="text-align: right;">Page 238</p> <p>1 coincidence or is that –</p> <p>2 A. I would find it an extraordinary</p> <p>3 coincidence. These guys are so deep-sixed that,</p> <p>4 just even to physically find them is like</p> <p>5 difficult.</p> <p>6 Q. So deep-sixed, you mean they're</p> <p>7 inaccessible or –</p> <p>8 A. Inaccessible.</p> <p>9 Q. – they keep a low profile?</p> <p>10 A. Yeah. They had a very low profile and</p> <p>11 they had a very low profile location.</p> <p>12 Q. And how is it that you knew about them,</p> <p>13 ASOG?</p> <p>14 A. Through Mike and one of his people.</p> <p>15 Q. And so, did there come a time when ASOG</p> <p>16 said, well, we can't do any research on this</p> <p>17 because of this –</p> <p>18 A. That's right.</p> <p>19 Q. – records protected status?</p> <p>20 A. Yes. That's right.</p> <p>21 Q. I understand you're eager to move</p> <p>22 forward, but, just for the court reporter, just</p> <p>23 please wait for me to ask the question.</p> <p>24 Could Strategic Vision still perform</p> <p>25 some research, though, even though some of the</p>	<p style="text-align: right;">Page 240</p> <p>1 their new address, or some sort of preliminary</p> <p>2 stuff that was being brought up, but if you were</p> <p>3 getting into deeper stuff, you couldn't touch it.</p> <p>4 You shouldn't touch it. And I'm sure he conveyed</p> <p>5 that to the – to the Team 1 leader.</p> <p>6 Q. So it's your understanding – Strategic</p> <p>7 Vision's understanding that Team One's work was</p> <p>8 curtailed because of the discovery that certain</p> <p>9 fish were restricted persons or records</p> <p>10 protected?</p> <p>11 A. That's correct.</p> <p>12 Q. And that was on or about January 30th,</p> <p>13 or whereabouts?</p> <p>14 A. No, no, no, no, no, no. This was</p> <p>15 way into the middle, the 15th to the 20th,</p> <p>16 something in there, of February.</p> <p>17 Q. That's when ASOG conveyed to you</p> <p>18 that –</p> <p>19 A. Yes.</p> <p>20 Q. – you were – okay.</p> <p>21 So let's just get a clear record then.</p> <p>22 When did ASOG tell you that certain people</p> <p>23 were – certain fish were records protected?</p> <p>24 A. At some point in Feb – in the middle</p> <p>25 of February 2018.</p>
<p style="text-align: right;">Page 239</p> <p>1 individuals were designated as records protected,</p> <p>2 or restricted persons, I'm sorry?</p> <p>3 A. We did not know at that point, and by</p> <p>4 that time we got some kind of service for a</p> <p>5 lawsuit. And our teams, we had to let our teams</p> <p>6 overseas know on the 23rd of February that they</p> <p>7 had to stop.</p> <p>8 Q. I just want to ask this, though. Could</p> <p>9 Team 1 still do its job, even though ASOG found</p> <p>10 that certain individuals were, as you described,</p> <p>11 records protected?</p> <p>12 A. That's – that's a question I'd have to</p> <p>13 leave for a lawyer in the – in the IC,</p> <p>14 intelligence community, to answer. We wouldn't</p> <p>15 want to do anything that would be illegal.</p> <p>16 Q. So you didn't direct Team 1 to stop its</p> <p>17 work when ASOG gave its report to you that people</p> <p>18 were records protected?</p> <p>19 A. We did. Mike did. He did talk to</p> <p>20 them. And even though the – he told them to</p> <p>21 stop doing anything that looked like it was</p> <p>22 peeking into something that they shouldn't be</p> <p>23 looking into.</p> <p>24 It's one thing to peek into somebody's</p> <p>25 license, driver's license number, or their –</p>	<p style="text-align: right;">Page 241</p> <p>1 Q. And then is it your understanding that</p> <p>2 Mike, very shortly thereafter, conveyed this</p> <p>3 information to Team 1?</p> <p>4 A. That's correct.</p> <p>5 MR. GRENDI: Let's do Exhibit 13.</p> <p>6 (Wallop Exhibit 13, Letter dated</p> <p>7 February 23, 2018, marked for</p> <p>8 identification.)</p> <p>9 Q. Do you recognize this document,</p> <p>10 Ms. Wallop?</p> <p>11 A. Actually, I never saw the letter. I</p> <p>12 gather it was delivered to – it says here it was</p> <p>13 delivered to – by hand delivery and electronic</p> <p>14 mail to me, but I was out of the country, and</p> <p>15 they had, in fact, sent it to the Nevada address.</p> <p>16 Q. The Nevada address, is that Strategic</p> <p>17 Vision's?</p> <p>18 A. Strategic Vision's Nevada agent</p> <p>19 address, yeah.</p> <p>20 Q. Does Strategic Vision have an office in</p> <p>21 Nevada?</p> <p>22 A. We have an agent.</p> <p>23 Q. Do you have a physical –</p> <p>24 A. Yes, it's an address.</p> <p>25 Q. – location that you can –</p>

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<p style="text-align: right;">Page 242</p> <p>1 A. Yes. It's on all the documents 2 somewhere. 3 Q. I'm asking if Strategic Vision has like 4 an office with – 5 A. No. It's an agent. It's an LLC. 6 That's where they set them up. Like Wyoming. 7 Q. And what's in Wyoming, I'm sorry? 8 A. LLCs. There are a lot of LLCs and 9 corporate trusts and so forth set up in Wyoming, 10 as there are in Nevada. 11 Q. Those are your corporate trusts and 12 LLCs? 13 A. No. 14 Q. I just want to clear it up. 15 You just mean it's a popular state for 16 incorporation? 17 A. Correct. 18 Q. Thank you. 19 So when did you first see this letter? 20 A. Oh, when I probably returned from the 21 Middle East; I think it was probably, I don't 22 know, the first or second week of March. 23 Q. Were you surprised by the letter? 24 A. I thought it was idiotic, yes. 25 Q. Why did you think it was idiotic?</p>	<p style="text-align: right;">Page 244</p> <p>1 A. I personally did not, no. 2 Q. Do you know if Dr. Waller did that 3 or – 4 A. Well, he did on the 30th, obviously. 5 Q. Right. I'm talking about after the 6 30th. 7 A. Okay. Well, I don't know. I don't 8 know. 9 Q. Okay. It says, "Eastern agreed to 10 delay the start of the contract by ten days from 11 January 6th to January 16th." Do you see that on 12 the first page, Eastern 198? 13 A. Yes. 14 Q. Is that the ten-day grace period or 15 accommodation that you were talking about – 16 A. Correct. 17 Q. – regarding the January – 18 A. Yes. 19 Q. – 26, 2018 meeting? 20 A. Yes. 21 Q. Thank you. 22 Did Strategic Vision attempt to contact 23 Mr. Guo or Lianchao or Ms. Wang after receipt of 24 this letter? 25 A. Well, Yvette had been taken off the</p>
<p style="text-align: right;">Page 243</p> <p>1 A. Because we heard nothing from them. We 2 were continuing to do the work. And it was 3 silly. 4 Q. What work was Strategic Vision doing 5 after January 30th that – 6 A. All of February. Or up until the 23rd 7 of February, to be precise. 8 Q. And were there any meetings with 9 Lianchao Han and Mr. Guo after January 30, 2018? 10 A. Not with us, no. 11 Q. With whom, then? 12 A. With Mike and myself, no. With 13 Lianchao and Guo, possibly. I don't know. 14 Q. Let me ask this then. Did you or 15 Dr. Waller meet with Lianchao after January 30, 16 2018 concerning this contract? 17 A. That's a good question. I doubt it, 18 because I didn't know that there was any issue 19 other than, you know, we were doing our best and 20 pedaling fast. 21 Q. So Strategic Vision didn't deliver any 22 information to Lianchao, or certainly Yvette, 23 after January 30, 2018? 24 A. We could have. I'd have to ask Mike. 25 Q. You didn't do it personally?</p>	<p style="text-align: right;">Page 245</p> <p>1 case. She was forbidden, apparently, to have 2 anything to do with it. So the only two people 3 that would have been contactable would have been 4 Lianchao and I'm sure that – again, I'm not sure 5 of the dates, but I'm sure – and Lianchao 6 travels, too, so I'm not sure where he was in 7 February, but I'm sure that both Mike and I must 8 have had some conversation with him in February, 9 after this. 10 Q. But you don't remember that, sitting 11 here today, what that conversation was like? 12 A. No. Well, I mean, we were very 13 surprised and very unhappy, and we'd been working 14 hard to – to do what Guo wanted, so... 15 Q. And did Lianchao say anything back to 16 you, or what was discussed? 17 A. I think he said that, you know, Guo 18 gets upset all the time about a lot of things, 19 and so maybe we – he could smooth it over and 20 calm him down and so forth. And then we just, I 21 think, hoped that that would happen, and it 22 didn't. So then the – this thing was done, so 23 we just stopped. 24 Q. You mean this lawsuit? 25 A. Yes.</p>

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<p style="text-align: right;">Page 246</p> <p>1 Q. When did you instruct Mike, or anyone 2 else involved with the Strategic Vision team, to 3 just stop work on this project? 4 A. After the 23rd of February. 5 Q. You don't remember the exact date? 6 A. No. We had things in the hopper that 7 were being produced, but they – we bought them, 8 so we had to pay for them, so when we got the 9 information, then we could produce it, but... 10 Q. And did Dr. Waller fly to Europe to 11 tell the leader of Team 1 to stop work, or how 12 did that happen? 13 A. I'm not sure. You would have to ask 14 him how he did that. He may have met with him 15 overseas. 16 Q. Okay. In connection with splitting the 17 profits from this engagement with Dr. Waller, do 18 you owe him money, or does Strategic Vision owe 19 him money I should say? 20 A. First of all, there weren't profits. 21 Q. Earlier we discussed your arrangement 22 with Dr. Waller to split the proceeds of this 23 engagement, correct? 24 A. That's correct. 25 Q. And has that splitting occurred, is</p>	<p style="text-align: right;">Page 248</p> <p>1 stamped SVUS000040 and SVUS000041, marked 2 for identification.) 3 Q. Just take a moment to take a look at 4 these two documents, SVUS40 and 41. 5 A. Correct. 6 Q. Do you recognize these documents? 7 A. Yes, I do. 8 Q. What are they? 9 A. I think these were done by the – I 10 can't remember if these were done by the ASOG 11 guys. I think they were done by the ASOG guys, 12 because of the socials. And they were – Xi 13 Ping – Xi Jinping, who is the premier of China, 14 and then his number 2, the next vice president of 15 the communist party in China. 16 And this is a – this is a – sort of a 17 geo – geologic – I mean, how would I put it? 18 It's sort of a graph of the connections between 19 certain families that were in the original 20 document that we were investigating. So this was 21 like a – not a flow chart; this was like a 22 genealogical – I don't know what you want to 23 call it – chart. 24 Q. A family tree, is that what it is? 25 A. It's sort of a family tree, yeah. But</p>
<p style="text-align: right;">Page 247</p> <p>1 what I should ask? 2 A. Yes, because our time was valuable for 3 those two months, plus the people that we had 4 already contracted to pay for the research and so 5 forth. We expected to have a three-month 6 contract at the very least, which were the terms 7 of the agreement, so... 8 Q. And what I'm asking is, did you at some 9 point send Dr. Waller a wire or write him a check 10 for his half of this engagement? 11 A. I already answered yes. 12 Q. And that was – was that \$250,000 that 13 you referred to earlier? 14 A. Yes. More or less. Plus expenses, 15 travel expenses and other expenses. 16 Q. And there was another wire for about 17 \$300,000 for Team 1, right? 18 A. Yes, at least. 19 Q. Okay. So as far as you and Dr. Waller 20 are concerned, there's nothing left to split, 21 that's already been – 22 A. Oh, that baby – that train's long left 23 the station. 24 MR. GRENDI: Let's go to 14. 25 (Wallop Exhibit 14, Document Bates</p>	<p style="text-align: right;">Page 249</p> <p>1 it shows the relationships of many of these 2 people that were in our original document from 3 Guo. 4 Q. Did you give this document to the 5 client? 6 A. To the client? 7 Q. Yeah, did you deliver this family tree? 8 A. This is when we were told they were 9 RPs. 10 Q. So you got this information on or about 11 February 15th? 12 A. Yes. Again, I would have to – yes. 13 Q. But you didn't give it to Lianchao? 14 A. We never gave it to him. We told 15 Lianchao. 16 Q. What this family tree or – 17 A. Yes. 18 Q. – chart includes? 19 A. We told them that they were all RPs, 20 that the names that we had were RPs that we had 21 given in. And, again, Mike would remember how 22 many of these we gave. 23 Q. And just turning to the second page – 24 A. Okay. 25 Q. – SVUS41?</p>

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<p style="text-align: right;">Page 250</p> <p>1 A. Correct.</p> <p>2 Q. Was this ever given to Lianchao Han?</p> <p>3 A. I believe it – it could – we may have</p> <p>4 shown it to him, but, because of the security</p> <p>5 concerns, given the RP status, we didn't probably</p> <p>6 physically give it to him. But we told him about</p> <p>7 it, and we told him that there were these – all</p> <p>8 of these names at the top had – were using</p> <p>9 duplicate Social Security numbers.</p> <p>10 Q. I'm just a little confused here, so</p> <p>11 please help me out. But how did ASOG get this</p> <p>12 information if the individuals were records</p> <p>13 protected?</p> <p>14 A. Because they had – oh, my goodness.</p> <p>15 They had access to – they work within the IC,</p> <p>16 they work within the intelligence community, they</p> <p>17 were DIA, NSA, D – other –</p> <p>18 Q. DOJ?</p> <p>19 A. No.</p> <p>20 Q. Okay. I was just trying.</p> <p>21 A. So they had access, and they had</p> <p>22 incredible backgrounds and CVs. So they had</p> <p>23 access into pulling up these names. And the more</p> <p>24 the – the more they – they could do the</p> <p>25 preliminary stuff, but the more they started to</p>	<p style="text-align: right;">Page 252</p> <p>1 Q. Ms. Wallop, have you ever seen what's</p> <p>2 been marked as Wallop 15, Bates number SVUS260?</p> <p>3 A. Yes.</p> <p>4 Q. When did you see this?</p> <p>5 A. When we were billed for the wire for</p> <p>6 the first month of Team 1.</p> <p>7 Q. And so, was this document given to</p> <p>8 Dr. Waller when –</p> <p>9 A. Yes.</p> <p>10 Q. – he was abroad?</p> <p>11 A. Yes.</p> <p>12 Q. And he brought it home?</p> <p>13 A. Yes.</p> <p>14 Q. Was there any negotiation of the prices</p> <p>15 quoted or –</p> <p>16 A. I'm sure Mike did, but this was</p> <p>17 dangerous stuff, so we did – we did – we agreed</p> <p>18 to whatever the number is that I can't read at</p> <p>19 the bottom here.</p> <p>20 Q. Yeah, it's a little bit of a fuzzy –</p> <p>21 A. Bad, bad.</p> <p>22 Q. – photocopy there at the end, right?</p> <p>23 A. It was either 267 or 278 or something.</p> <p>24 Q. You're talking about the total direct</p> <p>25 cost?</p>
<p style="text-align: right;">Page 251</p> <p>1 dig into the individuals, they found out that</p> <p>2 they were RPs.</p> <p>3 Q. Oh, so it wasn't immediately apparent</p> <p>4 to ASOG –</p> <p>5 A. It wasn't –</p> <p>6 Q. – that they were RPs?</p> <p>7 A. It wasn't right away, no.</p> <p>8 Q. Ah, I see. So they were able to find</p> <p>9 some information?</p> <p>10 A. They found this information that they</p> <p>11 shared with us, yes.</p> <p>12 Q. But at some point in their</p> <p>13 investigation, they realized, oops, those are</p> <p>14 RPs, we can't look anymore?</p> <p>15 A. That's correct.</p> <p>16 Q. Okay. And ASOG did give some</p> <p>17 information to Strategic Vision about these –</p> <p>18 the information that they did find?</p> <p>19 A. Yes.</p> <p>20 Q. I see.</p> <p>21 MR. GRENDI: Let's go to 15.</p> <p>22 (Wallop Exhibit 15, Document entitled</p> <p>23 "Line-Item Budget 1 Month Projected Cost</p> <p>24 Analysis" Bates stamped SVUS260, marked for</p> <p>25 identification.)</p>	<p style="text-align: right;">Page 253</p> <p>1 A. Yeah, um-hum, and I can't read that,</p> <p>2 quite honestly.</p> <p>3 Q. Did Team 1 ever return any of the funds</p> <p>4 that were sent to it –</p> <p>5 A. Why?</p> <p>6 Q. – for this engagement?</p> <p>7 A. Why on earth could – would they?</p> <p>8 MR. SCHMIDT: Just answer the question.</p> <p>9 A. No.</p> <p>10 Q. Is it fair to say there aren't any</p> <p>11 refunds in this business?</p> <p>12 A. Certainly not.</p> <p>13 MR. SCHMIDT: You're learning that the</p> <p>14 hard way.</p> <p>15 Q. I meant in connection with working with</p> <p>16 secret teams like Team 1; is that fair to say?</p> <p>17 A. That's correct.</p> <p>18 Q. Fair enough. And does Strategic Vision</p> <p>19 have bank records reflecting sending funds to</p> <p>20 Team 1?</p> <p>21 A. I'm sure we have a copy of a wire.</p> <p>22 (*r) MR. GRENDI: We're going to call for</p> <p>23 the production of that. I'll follow up.</p> <p>24 THE WITNESS: That's fine.</p> <p>25 MR. GRENDI: Go to 16.</p>

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<p style="text-align: right;">Page 254</p> <p>1 (Wallop Exhibit 16, Invoice from Allied 2 Special Operations Group, Bates stamped 3 SVUS000262, marked for identification.) 4 MR. SCHMIDT: After this document, why 5 don't we take a two-minute break? 6 MR. GRENDI: Yeah, sure. 7 Q. So do you recognize this document, this 8 invoice from Allied Special Operations Group? 9 A. Correct, ASOG. 10 Q. And why was the invoice reduced from 11 over \$100,000 to \$5,000? 12 A. Because they couldn't touch the – they 13 couldn't go into the files that they had – that 14 they had with the names; they could have gone to 15 prison, all right? So they refunded us – or 16 refunded is the wrong word. I wish they had 17 refunded, but, no, they sent us a bill – in 18 other words, so that you can see what this sort 19 of thing actually cost, this is what these things 20 cost, and this was only for a few names, and this 21 is only for one week. So they – you know, we 22 bit and screamed and hollered, and so they ended 23 up sending us the – the bill for the 5,000. 24 5,412.50. 25 Q. So, originally, ASOG was trying to get</p>	<p style="text-align: right;">Page 256</p> <p>1 screamed and hollered, and that's why – 2 A. Well, yeah, because normally we 3 understand – look, again, a little bit in the IC 4 is that – that, when you get into certain 5 records' protected arenas you cannot, you cannot 6 invade that space. 7 So while they were sniffing around the 8 edges of each one of these files, we said, you 9 know, between us, we can't touch it, so there 10 should be no bill. So then that's when they sent 11 the \$5,000 bill. 12 Q. Because they had spent some time trying 13 to do this? 14 A. They'd spent a week. And the time – 15 the timing thing is there, the time – whatever 16 it is. Our rate, hours worked. And those are 17 the initials of the people that worked there. 18 MR. GRENDI: We can take that break 19 now, if you like. 20 THE VIDEOGRAPHER: Off the record at 21 4:41. 22 (Whereupon, a short recess was taken.) 23 THE VIDEOGRAPHER: Back on the record 24 at 4:48. 25 MR. GRENDI: Let's do Exhibit 17 here.</p>
<p style="text-align: right;">Page 255</p> <p>1 \$105,000 from – 2 A. It was 111,000. 3 Q. Oh, I'm sorry. Did I miss – I thought 4 I – no, that's fair. Yeah, 111. 5 A. \$111,700. That's what these people 6 charge. Not these people, but the industry 7 charges. 8 Q. And Strategic Vision kind of fought 9 back on that and said, well, you didn't really do 10 the work, so? 11 A. No, we did not do that. 12 Q. How did you negotiate with them over 13 the total amount owed? 14 A. We explained to – I mean, they 15 explained to us that they would have gone ahead 16 and done it and billed us for the 111,000, 17 without question. Until they bumped into the 18 RPs. When they bumped into the RPs, they said, 19 we can't do it. You know, as American citizens, 20 neither can you. So we didn't. 21 Q. And because of that, they – ASOG 22 determined that they should reduce the invoice to 23 just \$5,000? 24 A. They did. 25 Q. I'm just confused, because you said you</p>	<p style="text-align: right;">Page 257</p> <p>1 This will be Wallop 17. 2 (Wallop Exhibit 17, Document Bates 3 stamped SVUS000272 to SVUS000277, marked for 4 identification.) 5 Q. Do you recognize this document, 6 Ms. Wallop? 7 A. I do. 8 Q. What is this? 9 A. This was an investigation background on 10 a couple of people that are on the list. 11 Q. Are they one of the 15 fish or are they 12 tertiary or – 13 A. That's a good question. I honestly 14 can't remember. But they were of great interest 15 to – I think they were part of the 15 fish. 16 They were a great interest to Guo. 17 Q. And just going back to ASOG. Has 18 Strategic Vision ever worked with ASOG before? 19 A. I haven't, but I've worked on the IC 20 with a couple of people that have been involved 21 with ASOG. 22 Q. And IC, does that mean intelligence 23 community? 24 A. Yes. 25 Q. And how did you work with members of</p>

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<p style="text-align: right;">Page 258</p> <p>1 ASOG in the IC?</p> <p>2 A. They were not ASOG then.</p> <p>3 Q. Right.</p> <p>4 A. They were in the IC when I worked with</p> <p>5 them.</p> <p>6 Q. And I take it you were in the</p> <p>7 intelligence community as well?</p> <p>8 A. Let's just say I've been helpful.</p> <p>9 Q. And certain members of ASOG were in the</p> <p>10 intelligence community when you were being</p> <p>11 helpful?</p> <p>12 A. I believe that's true, yes.</p> <p>13 Q. Does that have anything to do with</p> <p>14 Strategic Vision or is that just you personally,</p> <p>15 before you started working at Strategic Vision?</p> <p>16 A. My whole life, beyond the age of 21.</p> <p>17 Q. And why did you task Fletcher with –</p> <p>18 well, let me ask you this. Strike all that.</p> <p>19 Did you or Dr. Waller get in touch with</p> <p>20 Fletcher?</p> <p>21 A. Because they were two very curious</p> <p>22 people.</p> <p>23 Q. No, I'm saying did – was it you</p> <p>24 or Dr. –</p> <p>25 A. I did.</p>	<p style="text-align: right;">Page 260</p> <p>1 our gathering technique to farm out between Mike</p> <p>2 and myself who had the reach within a certain</p> <p>3 dimension. These guys were in the U.K., so my</p> <p>4 relationships within the IC within the U.K. are</p> <p>5 strong, so I went and had the conversation with</p> <p>6 several people about some of these people,</p> <p>7 including these two characters (indicating); and</p> <p>8 they carry English passports, British passports.</p> <p>9 Q. Let's just look at 18, because I</p> <p>10 believe this is the – no, not 18, not this one.</p> <p>11 MR. GRENDI: This will be Wallop 18.</p> <p>12 (Wallop Exhibit 18, Document entitled</p> <p>13 "Subject Chart," Bates SVUS000278, marked</p> <p>14 for identification.)</p> <p>15 Q. Do you recognize this document?</p> <p>16 A. I do.</p> <p>17 Q. And what is this?</p> <p>18 A. This has to do with, on our list</p> <p>19 number, number 72 and 73 on Exhibit 7.</p> <p>20 Q. I see. So these are – those are</p> <p>21 individuals identified on SVUS242 and 243?</p> <p>22 A. No, 73. Page 73.</p> <p>23 Q. I know. I'm talking about the Bates</p> <p>24 number, if you don't mind. I just want to be</p> <p>25 clear.</p>
<p style="text-align: right;">Page 259</p> <p>1 Q. You did?</p> <p>2 A. Yes. That's my contact.</p> <p>3 Q. And Strategic Vision paid this invoice</p> <p>4 to Fletcher?</p> <p>5 A. Correct.</p> <p>6 Q. When did Strategic Vision first request</p> <p>7 this research from Fletcher?</p> <p>8 A. It would have been probably in</p> <p>9 February; I'm not sure exactly, but probably at</p> <p>10 the beginning of February of 2018.</p> <p>11 Q. And was this in response to a specific</p> <p>12 request from the client or was it just an idea</p> <p>13 that Strategic Vision had in terms of getting</p> <p>14 more research?</p> <p>15 A. That's an odd question.</p> <p>16 Q. Let me ask it again then.</p> <p>17 A. That's an odd question.</p> <p>18 Q. Well, let me ask it again.</p> <p>19 A. You have a whole folder that we've been</p> <p>20 dispatched to –</p> <p>21 MR. SCHMIDT: He's going to ask it</p> <p>22 again. Let him ask it –</p> <p>23 A. I know, for Heaven's sakes, come on.</p> <p>24 Don't waste everybody's time.</p> <p>25 So it was in the folder, it was part of</p>	<p style="text-align: right;">Page 261</p> <p>1 A. Okay, they're Bates number 244 and 243,</p> <p>2 correct. Sorry.</p> <p>3 Q. I think you mean 242?</p> <p>4 A. 244 and 243, that's what I mean.</p> <p>5 Q. Okay.</p> <p>6 A. I take it back. I stand corrected.</p> <p>7 242 and 243, sorry.</p> <p>8 Q. That's okay.</p> <p>9 A. You can't recognize some of these</p> <p>10 passport pictures.</p> <p>11 Q. So is this the report that Fletcher put</p> <p>12 together based upon the invoice we were just</p> <p>13 looking at?</p> <p>14 A. That's correct.</p> <p>15 Q. And it says it's – it's dated</p> <p>16 March 21, 2018?</p> <p>17 A. Um-hum, that's right.</p> <p>18 Q. Is that when Strategic Vision received</p> <p>19 this report?</p> <p>20 A. Yes, probably.</p> <p>21 Q. Okay.</p> <p>22 A. But I had been there the month – a</p> <p>23 month earlier to – it takes – it takes some</p> <p>24 time to get this stuff.</p> <p>25 Q. So you had traveled to the United</p>

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<p style="text-align: right;">Page 262</p> <p>1 Kingdom –</p> <p>2 A. Yes.</p> <p>3 Q. – in February of 2018 to request this</p> <p>4 report?</p> <p>5 A. Correct.</p> <p>6 Q. And it came back around March 2018, or</p> <p>7 March 21, 2018?</p> <p>8 A. Correct.</p> <p>9 Q. And did Strategic Vision deliver this</p> <p>10 report to the client?</p> <p>11 A. Well, we didn't get it until March</p> <p>12 something, right? So we were in the middle of a</p> <p>13 sort of a lawsuit; so, no, we did not deliver it.</p> <p>14 Q. Did you edit that report at all after</p> <p>15 receiving it, or provide any input to it?</p> <p>16 A. Never touched it. Only paid it.</p> <p>17 Q. Did you ever review it?</p> <p>18 A. Yes, of course I read it.</p> <p>19 MR. GRENDI: 19.</p> <p>20 (Wallop Exhibit 19, Strategic Vision's</p> <p>21 Responses and Objections to Plaintiffs</p> <p>22 First Set of Interrogatories, marked for</p> <p>23 identification.)</p> <p>24 Q. Ms. Wallop, do you recognize this</p> <p>25 document?</p>	<p style="text-align: right;">Page 264</p> <p>1 says, "The trusted Chinese/English translators</p> <p>2 that Strategic Vision identified in connection</p> <p>3 with its contract with Eastern are Lianchao Han</p> <p>4 and Yvette Wang a/k/a Yanping Wang."</p> <p>5 Were those the only translators that</p> <p>6 Strategic Vision worked with in connection with</p> <p>7 this –</p> <p>8 A. Yes.</p> <p>9 Q. – contract?</p> <p>10 A. Yes.</p> <p>11 Q. So Strategic Vision did research in</p> <p>12 Chinese on other individuals without other</p> <p>13 translators?</p> <p>14 A. No. We had Team 1, as we have</p> <p>15 explained. Team 1 had translators that were not</p> <p>16 mainland Chinese. They were translators in the</p> <p>17 Chinese language, but were of another</p> <p>18 nationality.</p> <p>19 Q. I see.</p> <p>20 A. And that was explicit because Guo did</p> <p>21 not want any Chinese-speaking entities, other</p> <p>22 than Lianchao and Yvette, I guess, working on any</p> <p>23 of this.</p> <p>24 Q. Right. But what I'm driving at here</p> <p>25 is, there were translators on Team 1, correct?</p>
<p style="text-align: right;">Page 263</p> <p>1 A. Yes.</p> <p>2 Q. And what is this?</p> <p>3 A. Well, it looks like our general</p> <p>4 objections, that is Strategic Vision's general</p> <p>5 objections to Eastern Profit and Guo.</p> <p>6 Q. You understand that these are</p> <p>7 interrogatories?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And looking at interrogatory</p> <p>10 number 6?</p> <p>11 A. Yes.</p> <p>12 Q. Strike that.</p> <p>13 Did you aid in the preparation of these</p> <p>14 interrogatory responses?</p> <p>15 A. Well, they're my lawyers, so they asked</p> <p>16 me questions, so I answered –</p> <p>17 Q. Don't say what you said. But you did</p> <p>18 provide them with information? I just don't want</p> <p>19 you to reveal attorney/client communications.</p> <p>20 A. Yes.</p> <p>21 Q. And you provided them with information?</p> <p>22 A. Yes. I signed it.</p> <p>23 MR. SCHMIDT: You verified it.</p> <p>24 THE WITNESS: Yes.</p> <p>25 Q. Going to interrogatory number 6. It</p>	<p style="text-align: right;">Page 265</p> <p>1 A. Yes. We had to get them through their</p> <p>2 sources, probably about two or three weeks into</p> <p>3 the thing, because they were coming up with stuff</p> <p>4 that they didn't know what it was, and we were –</p> <p>5 sorry – we were turning over information. But</p> <p>6 we had to be able to dissect the information –</p> <p>7 Q. Sure.</p> <p>8 A. – and interpret the information so</p> <p>9 that we could turn it over. Not just a bunch of</p> <p>10 gobbledygook.</p> <p>11 Q. In other words, in order to do research</p> <p>12 on Chinese documents, you kind of need to read –</p> <p>13 be able to read –</p> <p>14 A. Yes. That's right.</p> <p>15 Q. – in Chinese or Mandarin?</p> <p>16 A. That's right.</p> <p>17 Q. Okay. So Strategic Vision did use</p> <p>18 translators other than Lianchao Han and Yvette</p> <p>19 Wang in connection with this agreement?</p> <p>20 A. Yes, but I have no idea who they were.</p> <p>21 Q. Fair enough.</p> <p>22 MR. SCHMIDT: Just for clarity. I'm</p> <p>23 not sure what paragraph 60 says, sitting</p> <p>24 here today, of the amended answer and</p> <p>25 counterclaim.</p>

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<p style="text-align: right;">Page 266</p> <p>1 MR. GRENDI: Fair enough.</p> <p>2 Q. Let's do interrogatory number 8. It</p> <p>3 says here, "Because of Mr. Guo's erratic behavior</p> <p>4 and tortious interference, and because the</p> <p>5 engagement had just begun, Strategic Vision was</p> <p>6 unable to prepare any detailed reports in the</p> <p>7 short time before Eastern suddenly terminated the</p> <p>8 contract without notice and commenced this</p> <p>9 action." Do you see that response?</p> <p>10 A. Yes.</p> <p>11 Q. What was the erratic behavior you're</p> <p>12 talking about in that response?</p> <p>13 A. He's a very erratic, emotional, often</p> <p>14 almost to the degree of being bipolar in his</p> <p>15 responses to many conversations that we had in</p> <p>16 his – in his home. And he was like a squash</p> <p>17 ball; he was like bing, bing, bing, and you</p> <p>18 couldn't keep – you couldn't keep him focused on</p> <p>19 any subject for very long.</p> <p>20 Q. And how did that prevent Strategic</p> <p>21 Vision from preparing detailed reports?</p> <p>22 A. Because we were – we were explaining</p> <p>23 to him the process of how you get the deeper</p> <p>24 volumes of information, versus his trying to just</p> <p>25 get a quick fix. And he – it was hard for him</p>	<p style="text-align: right;">Page 268</p> <p>1 informed completely all along the way, whenever</p> <p>2 we met with him.</p> <p>3 Q. I'm just doing interrogatory number 12,</p> <p>4 page 7 there.</p> <p>5 MR. SCHMIDT: 12?</p> <p>6 MR. GRENDI: Interrogatory number 12,</p> <p>7 yeah.</p> <p>8 Q. Actually, let's do 11. I apologize.</p> <p>9 Who are the computer experts and authorities in</p> <p>10 three countries who provided warnings to</p> <p>11 Strategic Vision concerning computer issues or</p> <p>12 problems with Mr. Guo's –</p> <p>13 A. Well, you could start with The United</p> <p>14 States, one of the countries.</p> <p>15 Q. I don't know if I understand that</p> <p>16 response. I was asking about computer experts.</p> <p>17 You're saying authorities in The United States?</p> <p>18 A. Hello. I don't know what to say. I</p> <p>19 mean, I don't understand the question.</p> <p>20 MR. SCHMIDT: Would it help if you look</p> <p>21 at paragraph 67? Do you have that?</p> <p>22 MR. GRENDI: I don't have it in front</p> <p>23 of me. Actually, I do have it. I mean,</p> <p>24 we're going to mark this as an exhibit, but</p> <p>25 I'm happy to show it to the witness now, to</p>
<p style="text-align: right;">Page 267</p> <p>1 to actually listen and understand how the process</p> <p>2 actually works. He was very erratic.</p> <p>3 Q. I'm sorry, I didn't hear that.</p> <p>4 A. He was very erratic.</p> <p>5 Q. Sitting here today, do you know who</p> <p>6 prepared any of the reports that were delivered</p> <p>7 to, or purportedly delivered to Eastern?</p> <p>8 A. There were no reports. You keep</p> <p>9 hammering on reports. There were USB keys, flash</p> <p>10 drives that were – that was our process, which</p> <p>11 he insisted on equally. We had no written</p> <p>12 reports; that he could put the thumb drive into</p> <p>13 his computer and read whatever it was, okay?</p> <p>14 Then he would take it out, presumably, God</p> <p>15 forbid, I hope never downloaded it, take it out</p> <p>16 and put it in his safe. That was the process.</p> <p>17 Q. And of all of the USBs that were</p> <p>18 delivered, who did those deliveries? I just want</p> <p>19 to understand.</p> <p>20 A. Mike.</p> <p>21 Q. So Mike – Mike Waller delivered how</p> <p>22 many USB reports?</p> <p>23 A. I believe there were at least two.</p> <p>24 There could have been three. And we had many</p> <p>25 face-to-face conversations with Guo. So he was</p>	<p style="text-align: right;">Page 269</p> <p>1 deal with it that way.</p> <p>2 A. 67.</p> <p>3 Q. So I guess the question is, can you</p> <p>4 identify the computer experts and authorities in</p> <p>5 three countries that you referred to in paragraph</p> <p>6 67?</p> <p>7 A. I can tell you that ASOG was one of</p> <p>8 them –</p> <p>9 Q. Okay.</p> <p>10 A. – in Texas, and the others were in –</p> <p>11 were overseas and part of Team 1. They found</p> <p>12 duplicate attempts to, and not at the same time,</p> <p>13 because Team 1 was already working in this case,</p> <p>14 long before Team 2 ever knew of it.</p> <p>15 So Team 1 was the one that alerted us</p> <p>16 to Guo's failings in – in putting a number of</p> <p>17 things himself online, like Anita. He used the</p> <p>18 same photograph of Anita in one of his – in one</p> <p>19 of his – this thing here (indicating), in one of</p> <p>20 his blogs.</p> <p>21 Q. And I'm just, for the record, what</p> <p>22 document are you referring to? It's obviously</p> <p>23 Exhibit 7, but what page?</p> <p>24 A. It's page – page 4 in doc – in</p> <p>25 Exhibit 7.</p>

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<p style="text-align: right;">Page 270</p> <p>1 Q. Okay. And you don't know the 2 identities of any of the members of Team 1? 3 A. No, none of them. 4 Q. And interrogatory number 12, just below 5 that. 6 A. Well, that happened both with – with 7 Texas and with the overseas. 8 Q. Okay. So the ASOG team, why did they 9 quit? 10 A. Because it was illegal for them to look 11 into records of RPs. That's why we had one bill, 12 and then we had the little bill. 13 Q. And so the – the ASOG folks didn't 14 quit because they were concerned about security, 15 they were quitting because they couldn't do – 16 legally do the research, is that fair to say? 17 A. Well, there's a lot of potential danger 18 in going to prison, so they decided that, really, 19 they were not going to risk anything that would 20 be – and it says alarming breach of Guo's 21 security, because they also saw some of this 22 stuff that Guo had on his own blog that looked 23 like it was out of our own file. 24 Q. So did you understand that ASOG quit 25 for both of those reasons, because –</p>	<p style="text-align: right;">Page 272</p> <p>1 contractor which performed research for Strategic 2 Vision pursuant to the contract." Do you see 3 that? 4 A. I do. 5 Q. And is it fair to say that there's two 6 teams identified in the response? 7 A. Yes. 8 Q. And that's Team 1, which we've been 9 talking about was the team that was headed up by 10 Dr. Waller? 11 A. Yes. 12 Q. And ASOG, which is – we've been 13 talking about in the last few questions? 14 A. Correct. 15 Q. But Strategic Vision did include some 16 other contractors in the research, correct? 17 A. Yes, with individual – how should I 18 put it – individual names, not the whole file. 19 Q. Is there any reason you didn't include 20 Fletcher? 21 A. I forgot, actually. I found it in the 22 file. 23 Q. Is there anyone else that you forgot 24 about? 25 A. There is one other in Switzerland, but</p>
<p style="text-align: right;">Page 271</p> <p>1 A. You'd have to ask Mike. Mike had a 2 better handle on that than I did. 3 Q. How did you find out that the ASOG team 4 had quit, did Mike tell you about that? 5 A. Mike told me. 6 Q. You didn't directly communicate with – 7 A. No. 8 Q. – ASOG about that? 9 A. Uh-uh. 10 MR. GRENDI: We're up to 20. 11 (Wallop Exhibit 20, Strategic Vision's 12 Supplemental and Amended Response and 13 Objections to Plaintiff's First Set of 14 Interrogatories, marked for identification.) 15 Q. Ms. Wallop, do you recognize what's 16 been marked as Wallop 20? 17 A. Yes. 18 Q. Did you contribute to the answers 19 provided in this document? 20 A. I did. 21 Q. And you swore to their – or verified 22 those answers? 23 A. I did. 24 Q. So, looking at interrogatory number 7, 25 the interrogatory asked for, "each independent</p>	<p style="text-align: right;">Page 273</p> <p>1 it was not – I'll have to see what I can find in 2 the way of any kind of paperwork. I'll have 3 to – I'll have to look for it, but I didn't find 4 it going through in the – in the files that I 5 have. 6 (*r) MR. GRENDI: We'll call for the 7 production of documents concerning the 8 entity in Switzerland. 9 Q. Do you know the name of that entity? 10 A. No. 11 Q. Was that an entity that was contracted 12 through – 13 A. It was a dead end. It was a dead end, 14 but I had to – I had to pay for the time that it 15 took to find nothing. 16 Q. And that was an entity that was 17 contacted through your channels? 18 A. Yes. 19 Q. And you did have to pay them money? 20 A. I believe so. It wasn't – it wasn't 21 very much compared to what the normal charges 22 are. 23 Q. Interrogatory 10, response refers to a 24 John Doe 1, do you see that? 25 A. Yes.</p>

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<p style="text-align: right;">Page 274</p> <p>1 Q. And why is it that John Doe 1 was not 2 disclosed? 3 A. Well, we did disclose it. It is 4 disclosed. 5 MR. SCHMIDT: Today, earlier today she 6 told you. 7 A. Richard Shewell. 8 Q. Oh, okay. That's helpful. Thank you. 9 Is Richard Shewell a cyber security 10 expert? I thought he was just your neighbor? 11 A. Neighbor. But he spends a lot of time 12 in cyber security. 13 Q. And where does he work? 14 A. He works – he's an independent 15 contractor. 16 Q. Had he ever provided cyber security 17 advice or services to Strategic Vision before, 18 ever, put it that way? 19 A. Never charged for it, no. 20 Q. Okay. How did you – has Strategic 21 Vision ever brought work to Mr. Shewell? I'm 22 sorry, how do you say his name? 23 A. Shewell. 24 Q. Shewell. 25 A. I'm not sure. Would you repeat the</p>	<p style="text-align: right;">Page 276</p> <p>1 Q. And just going to paragraph 54? 2 A. Yes. 3 Q. When did Mr. Guo allegedly promise that 4 he would adequately fund Eastern? 5 A. From the very beginning, the first – 6 excuse me – the first day that we met. It was 7 not as – with Eastern, it was personally. 8 Q. And just please explain to me what he 9 said or – 10 A. He said, I have millions and millions 11 of dollars. I need to fund this, and I will do 12 it from my personal, I guess, wealth. 13 Q. Then it says "adequately fund Eastern." 14 Where did Eastern come from in those 15 conversations? 16 A. I have no idea where the Eastern part 17 came from, because we never knew about Eastern 18 until it turned up in the – in the agreement. 19 Q. So there was never a time when Mr. Guo 20 promised that he would adequately fund Eastern? 21 A. He didn't adequately say Eastern, per 22 se. If he's the contractor, if he's the person 23 we're contracting with, and he decides he's going 24 to use a shell company to fund us, and he tells 25 us that that funding will be there, we are then</p>
<p style="text-align: right;">Page 275</p> <p>1 question? 2 Q. Sure. 3 A. It's odd. 4 Q. Has Strategic Vision ever utilized 5 Mr. Shewell for any service? 6 A. No. 7 Q. Have you personally consulted 8 Mr. Shewell for your own computer issues or 9 things like that? 10 A. Yes. 11 Q. So that's your experience with 12 Mr. Shewell, it's just on a personal basis – 13 A. Yes. 14 Q. – not involving Strategic Vision? 15 A. Correct. 16 MR. GRENDI: Let's do Document 21. 17 (Wallop Exhibit 21, Amended Answer and 18 Counterclaims, marked for identification.) 19 Q. Ms. Wallop, do you recognize what's 20 been marked as Wallop 21? 21 A. Yes, of course, I've seen it. 22 Q. And what is this document? 23 A. Amended answer and counterclaims to – 24 between Eastern Profit, Strategic Vision and 25 Miles Kwok, known as Guo Wengui.</p>	<p style="text-align: right;">Page 277</p> <p>1 led to believe that that funding exists; and so, 2 therefore, we didn't know whether it was Eastern 3 or Mickey Mouse Club or whatever. 4 Q. Did Mr. Guo ever say to you that he 5 would adequately fund the Eastern Profit 6 Corporation? 7 A. Yes, he did. But he didn't say Eastern 8 Profit. He said, this project. 9 Q. So he said, I'll fund this project? 10 A. Yes, he did, numerous times. 11 Q. But he did not say that he would 12 adequately fund Eastern? 13 MR. SCHMIDT: Objection, she's answered 14 already. 15 MR. GRENDI: That's okay. 16 You can answer it. 17 A. Never heard of Eastern, as I said 18 before, until we got into the agreement. 19 Q. Paragraph 60? 20 A. 60? 21 Q. 60, 6-0. 22 A. Okay. 23 Q. It says, "immediately upon entering 24 into the agreement, Strategic Vision commenced 25 its work under the agreement by and among other</p>

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<p style="text-align: right;">Page 278</p> <p>1 activities recruiting, vetting, engaging and</p> <p>2 marshaling the initial efforts of the various</p> <p>3 investigators and analysts in The United States,</p> <p>4 Europe and the Middle East." Do you see that?</p> <p>5 A. I do.</p> <p>6 Q. Did Eastern ever engage any analysts in</p> <p>7 the Middle East?</p> <p>8 A. Eastern?</p> <p>9 Q. Oh, I'm sorry, Strategic Vision. Did</p> <p>10 Strategic Vision ever engage any analysts in the</p> <p>11 Middle East?</p> <p>12 A. It could have, and I wouldn't know. It</p> <p>13 could have been done through Team 1.</p> <p>14 Q. Wasn't Team 1 located in Europe?</p> <p>15 A. They were, but they could have – they</p> <p>16 all have links.</p> <p>17 Q. Okay. Let me ask you this then. So is</p> <p>18 it your understanding that Team 1 could farm out</p> <p>19 its responsibilities to other teams to help it</p> <p>20 get information?</p> <p>21 A. It was all part of the team.</p> <p>22 Q. Right. What I'm asking is, did Team 1</p> <p>23 have subteams?</p> <p>24 A. No. They would have had teams that –</p> <p>25 well, if you call them subteams, they weren't.</p>	<p style="text-align: right;">Page 280</p> <p>1 Q. And what vetting was done to select</p> <p>2 the – well, what vetting was done to select Team</p> <p>3 1?</p> <p>4 A. Experience.</p> <p>5 Q. So just Dr. Waller's experience with</p> <p>6 Team 1?</p> <p>7 A. Yes.</p> <p>8 Q. Let's look at paragraph 62. Paragraph</p> <p>9 62 says that, "Mr. Guo provided to Strategic</p> <p>10 Vision a list of 92 potential subjects with no</p> <p>11 prioritization." Do you see that in the middle</p> <p>12 of the paragraph there?</p> <p>13 A. I do.</p> <p>14 Q. And what list was that that had just 92</p> <p>15 non-prioritized names?</p> <p>16 A. Exhibit 7.</p> <p>17 Q. So you didn't understand that there was</p> <p>18 any priority to the 15 names that are in very</p> <p>19 large font with numbers next to them?</p> <p>20 MR. SCHMIDT: Objection. Go ahead.</p> <p>21 A. No, I would not – I would not agree</p> <p>22 with that. We numbered them as to priority.</p> <p>23 Q. Well, you received the document with</p> <p>24 the numbers next to – let's just say, if you</p> <p>25 look at the first page?</p>
<p style="text-align: right;">Page 279</p> <p>1 They were part of the original team. And if they</p> <p>2 used people in the Middle East or Europe or</p> <p>3 wherever – you know, the dark web has no</p> <p>4 geographical location, so it could have been</p> <p>5 anywhere that they were – they were challenging</p> <p>6 each other to find what they needed to find.</p> <p>7 That's how it works.</p> <p>8 Q. But you understood Team 1 was located</p> <p>9 in Europe, correct?</p> <p>10 A. Yes.</p> <p>11 Q. And Team 2 wasn't – well, Team 2 was</p> <p>12 ASOG, correct?</p> <p>13 A. Correct.</p> <p>14 Q. And Team 2 is located in The United</p> <p>15 States?</p> <p>16 A. Correct.</p> <p>17 Q. And ASOG wasn't contacted until what</p> <p>18 time?</p> <p>19 A. I answered that before.</p> <p>20 Q. Was that about February, middle –</p> <p>21 A. The beginning of February, and then</p> <p>22 beginning to the 5th – I don't know, 5th of</p> <p>23 February. I have to go back and look.</p> <p>24 Q. And what was the recruiting process?</p> <p>25 A. Mike and I were using our channels.</p>	<p style="text-align: right;">Page 281</p> <p>1 A. Yes.</p> <p>2 Q. It says Anita Suen –</p> <p>3 A. Yeah.</p> <p>4 Q. – and it has a big 1 next to it?</p> <p>5 A. Yes.</p> <p>6 Q. It also has the types of reports, does</p> <p>7 it not?</p> <p>8 A. Correct.</p> <p>9 Q. Did you not understand that that meant</p> <p>10 that Anita Suen would be one of the fish?</p> <p>11 A. She was the first fish.</p> <p>12 Q. Right.</p> <p>13 A. She was the most important fish for</p> <p>14 him.</p> <p>15 Q. Right.</p> <p>16 A. So the first, more or less, 15 in here</p> <p>17 were the first – were the first 15 fish that he</p> <p>18 was talking about.</p> <p>19 Q. And there happens to be exactly 15</p> <p>20 names with a number next to it and the number of</p> <p>21 reports that were requested, and the types of</p> <p>22 reports?</p> <p>23 A. Pretty much, yes. You'd have to count</p> <p>24 the names of the fish, yeah. If you can see –</p> <p>25 so you can't go by the page number, in other</p>

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<p style="text-align: right;">Page 282</p> <p>1 words. You have to go by the subject. See, 2 like, here is the second fish (indicating). 3 Q. Right. 4 A. So the second fish is on page 11. 5 Q. Right. 6 A. Okay. So you – you'd have to go – so 7 these 15 fish are in here at least – at least 15 8 fish in here. 9 Q. And you understood that those were 10 the – or Strategic Vision understood that those 11 were the 15 fish that the research was supposed 12 to start on, correct? 13 A. Yes. 14 MR. SCHMIDT: Objection. 15 Q. Do you still have the virgin laptop 16 that's described in paragraph 63? 17 A. Yes. 18 Q. And do you just have a ton of these 19 virgin laptops lying around, because of your – 20 Strategic Vision's work? 21 A. On this specific issue, we had two 22 domestic ones, ones here, and then a battery of 23 ones overseas. 24 Q. Could Strategic Vision get those 25 laptops if they request – it requested them from</p>	<p style="text-align: right;">Page 284</p> <p>1 Q. Who did you understand was doing that 2 surveillance, you mean the building security or 3 the – 4 A. Oh, any number of people could easily 5 do the – the security. Mike's face is very 6 recognizable, people who knew who Mike was; 7 anybody in the Chinese communist party would have 8 made us, so... 9 Q. I see. But Strategic Vision did meet 10 with Mr. Guo repeatedly after the contract was 11 signed? 12 A. We tried not to. 13 MR. SCHMIDT: Objection. 14 THE WITNESS: Oh, sorry. 15 MR. SCHMIDT: It's okay. 16 A. We tried not to. We explained to him 17 after about maybe the fourth time that we just 18 couldn't do that anymore, it was just really 19 dangerous for him and dangerous for us. 20 Q. Just so we're clear. The last time you 21 personally met with Mr. Guo was – was that 22 January 30th? 23 A. That was the 26th. No, it was the 26th 24 of January, because the 30th was when Mike met 25 with Yvette at Union Station.</p>
<p style="text-align: right;">Page 283</p> <p>1 Team 1? 2 A. Never. They've been destroyed. They 3 were destroyed on purpose, because we would 4 destroy them every week so that there was no 5 tracing to the IP number. 6 Q. So it's Strategic Vision's practice to 7 regularly destroy these laptops for security 8 purposes? 9 A. Those particular ones, yes. We did not 10 destroy the two that we had. 11 Q. Paragraph 66, it says, "at the time the 12 agreement was negotiated with Mr. Guo, Strategic 13 Vision and Mr. Guo expressly agreed that they 14 would not meet in person again." Do you see 15 that? 16 A. Yes. 17 Q. Was that maintained or followed? 18 A. He kept insisting on wanting to meet 19 us, and we kept trying to explain to him that 20 every time we went in and out, we were being 21 photographed. We didn't like that. We did not 22 want to be identified with his programs. 23 Q. And, by photographed, do you mean going 24 in and out of his apartment building? 25 A. Yes.</p>	<p style="text-align: right;">Page 285</p> <p>1 Q. Got it. 2 A. Or Penn Station. 3 Q. When did Mr. Guo summon you to his 4 yacht in Florida? 5 A. That must have been sometime – it 6 might have been at the 26th meeting, January 26, 7 2017 – 2018. 8 Q. But I take it that yacht meeting never 9 happened? 10 A. No. We refused to go. It was not 11 safe. 12 Q. Let's go to paragraph 68. It says 13 "Strategic Vision learned that most of the 14 individuals so identified by Eastern have been 15 designated by the U.S. Department of State under 16 the Obama administration as records protected 17 persons, meaning that information concerning 18 their status and activities was not subject to 19 disclosure under any circumstance." Do you see 20 that? 21 A. That's correct. 22 Q. And did that in any way hinder Team 23 One's efforts, the records protected persons 24 designation? 25 A. Actually, the curious thing is here, we</p>

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<p style="text-align: right;">Page 286</p> <p>1 did not alert Eastern, we alerted Guo and we 2 alerted Lianchao, and – and I believe that 3 Yvette was alerted – no, I don't think – Yvette 4 may not have been alerted because that was – by 5 that time, it was in February. 6 Q. It says most of the individuals. Is 7 that most of the fish? 8 A. Yes. 9 Q. Is it fair to say that ASOG only looked 10 into five individuals on the list? 11 A. I don't know how many they looked into. 12 Again, you would have to ask Mike. They could 13 have looked into all of them. I honestly don't 14 remember. 15 Q. Let's look at paragraph 70. 16 A. 70? 17 Q. 7-0, yeah. 18 A. Okay. 19 Q. It says, "Strategic Vision verbally 20 reported to Mr. Guo and Eastern that Strategic 21 Vision could not within the limits of U.S. law 22 obtain the information sought by Eastern on its 23 initial list of subjects and that Strategic 24 Vision's work would be refocused upon others on 25 Eastern's list"</p>	<p style="text-align: right;">Page 288</p> <p>1 you'll be in bigger trouble than we will. 2 They'll send you back to China. 3 Q. Going to paragraph 71. It says: 4 "In the face of Eastern's insistence, 5 however, Strategic Vision hand-delivered its raw 6 data to Mr. Guo and Eastern on January 26, 2018, 7 with the caveat that it would be of no use to 8 Eastern until Strategic Vision had an opportunity 9 to analyze it and produce a formal report?" 10 A. Yes, that's correct. And formal report 11 would have meant, not just sort of a – a file 12 that had been encrypted, but it also needed to 13 have Chinese translation, as I understood it, and 14 also needed to have – and also needed – there 15 are certain lines of code. 16 Look, I'm not a code expert, but there 17 are lines of code that people have to go through 18 and actually sort of translate into a language, 19 and he kept – and it takes time to actually 20 translate that code. You can't just stick it 21 into a machine and expect it to happen. 22 So we gave him the raw code, I believe, 23 on both the 26th and the 31st, or the 31st of 24 January, those two different USB keys. 25 Q. Then it says, "until Strategic Vision</p>
<p style="text-align: right;">Page 287</p> <p>1 Do you remember when you told 2 Mr. Guo – 3 A. That must have – 4 Q. – this information? 5 A. That must have been through Lianchao. 6 And you keep using the word Eastern. It would 7 have been – 8 Q. I was just reading the complaint. 9 A. Yeah, but it's – it's not Eastern. 10 It's Guo. And I think it would have been – that 11 would have been at the – that would have been at 12 the – at the January 26th lunch. 13 Q. It says, "As a result, Mr. Guo became 14 enraged?" 15 A. Yes. He was – I thought he was going 16 to jump on the table. 17 Q. "And irrationally insisted that 18 Strategic Vision immediately deliver its work 19 product?" 20 A. That's correct. And continue to dive 21 into illegal areas. And we said, we can't do 22 that. That's when Mike apologized and said, 23 we're really sorry, but, you know, there are 24 certain things we can do, and we'll get, but 25 there are other things we can't do, and we –</p>	<p style="text-align: right;">Page 289</p> <p>1 had an opportunity to analyze it and produce a 2 formal report." How would that work? 3 A. Well, we needed to be able to take that 4 USB key back to the Team 1 to have them go 5 through and – and configure however it was 6 supposed to be done. And that was not – that 7 was not my area, that was Mike's area, and Mike 8 can explain that really succinctly to you. 9 Q. Paragraph 74. There's a reference to a 10 wire reversal? 11 A. Yes. 12 Q. How did that attempted wire reversal 13 come to your attention? 14 A. That was wild. I got a call, like, 15 about the – I have to see, I think it was around 16 the 12th or the 16th or something like that of 17 January 2018, and – from Citibank wire 18 department saying that there'd been a request to 19 have 499,000 and some change reversed back to the 20 sender. And I said, well, what are you talking 21 about? She said, well, we've gotten a request. 22 So then I called one of my private 23 bankers at Citibank and I said, can this be done? 24 I've never heard of such a thing. He said, 25 absolutely not, it can never be done. Once the</p>

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<p style="text-align: right;">Page 290</p> <p>1 money lands in the account, it's yours. I said, 2 it's not mine. I wish. It belongs to the 3 company, and so, therefore, we've already started 4 wiring stuff out. So that was going to be a huge 5 mess. And we got absolutely zero notification 6 from Guo or Eastern, or whatever they're calling 7 themselves. 8 Q. Do you know if that attempted wire 9 reversal was initiated before or after the 10 research agreement was signed? 11 A. I have no idea. I think it was after. 12 Q. But sitting here today, you don't 13 know – 14 A. It was after. I think it was after. 15 Q. Why do you think it was after? 16 A. Because it was the following week – 17 we'd signed the thing on the 6th, and then I 18 think it was the following week that Citibank 19 called me. So, as I said, it was probably like 20 the 12th or something like that, I – I don't 21 remember. I've got some note somewhere that says 22 when they called. 23 Q. I just have a few more questions, and 24 then I'll turn it over to Ms. Teske. 25 Is Strategic Vision a licensed private</p>	<p style="text-align: right;">Page 292</p> <p>1 not registered? 2 A. Both. 3 Q. Okay. And are you a licensed real 4 estate broker in the state of Virginia? 5 A. I have been, in the District of 6 Columbia, but I no longer maintain the license, 7 but I have been. 8 Q. When did you cease to have the license? 9 A. Oh, gosh. I got it for commercial real 10 estate reasons, so that I could sort of wade 11 through a lease, business office leases; so I 12 would say back in the '80s. 13 Q. And you never had a license in Virginia 14 to be a real estate agent or broker? 15 A. No, but I – if you're trying to get to 16 the Evermay thing, that was a private transaction 17 that would have taken place. 18 MR. SCHMIDT: Just answer the question. 19 A. No. 20 MR. GRENDI: Go ahead, Ms. Teske. I'm 21 all set for now. Thank you very much for 22 answering my questions today. 23 EXAMINATION BY 24 MS. TESKE: 25 Q. Okay, Ms. Wallop, are you ready to</p>
<p style="text-align: right;">Page 291</p> <p>1 investigator in any state? 2 A. Never been. Never. We never portrayed 3 ourselves as that. 4 Q. And are you a licensed – personally, a 5 licensed private investigator in any state? 6 A. I never portrayed myself as that. 7 Q. And what about Dr. Waller, do you know 8 if he has a license for being a private 9 investigator? 10 A. We never portrayed ourselves as that, 11 or himself as that. 12 Q. Has Strategic Vision ever registered as 13 a foreign agent under the Foreign Agent 14 Registration Act? 15 A. No, not recently, no. 16 Q. Has it previously? 17 A. No. I think other – other – other 18 company names in the past, yes, but not – not 19 Strategic Vision. 20 Q. What about you personally, have you 21 ever registered as a foreign agent? 22 A. No. 23 Q. And do you know if Dr. Waller has? 24 A. No. 25 Q. You don't know, or you know that he is</p>	<p style="text-align: right;">Page 293</p> <p>1 continue? 2 A. I am. Not for long, but I will. 3 MR. SCHMIDT: You don't need a break 4 right now? 5 THE WITNESS: No. I just need to tell 6 somebody where I am. 7 MS. TESKE: And on the record, without 8 waiving any entitlement to render or issue a 9 notice of deposition, Ms. Wallop, I'm going 10 to do my best to wrap it up here today. 11 MR. SCHMIDT: I would suggest that, 12 because we're going to probably oppose any 13 such notice. But go ahead. 14 THE WITNESS: Go ahead. 15 Q. Good afternoon, Ms. Wallop. I'm Erin 16 Teske. I represent Mr. Kwok in this action. I 17 just have a few follow-up questions. I'll do my 18 best not to be redundant. If you don't 19 understand any question I'm asking, please feel 20 free to let me know and I'll try to rephrase for 21 you. 22 I want to go back to your background a 23 little bit. You had said, I believe – and, 24 again, I'm trying to remember from earlier today, 25 so if I mischaracterize your testimony or your</p>

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<p style="text-align: right;">Page 294</p> <p>1 beliefs at any point, please, again, tell me so 2 that that can be clear for the record. 3 I think you had said that, for 4 Strategic, you have – about 15 to 20 clients 5 have engaged Strategic to do investigative 6 research for them, is that accurate? 7 A. No, I did not say that. What I said 8 was that I have had clients that have engaged us 9 to do specific advisory work. It's not 10 investigative work. That's very different. 11 Q. Okay. And I think, in connection with 12 that advisory work and those engagements, you 13 said that you tend to have written contracts with 14 those clients? 15 A. Generally, yes. 16 Q. Have any of those contracts been with 17 corporations? 18 A. No. 19 Q. Prior to your experience at – prior to 20 your experience at Strategic, were you in the 21 business of providing services for individuals or 22 corporations? 23 A. Yes. 24 Q. And how were you in that business? 25 MR. SCHMIDT: Objection. But go ahead.</p>	<p style="text-align: right;">Page 296</p> <p>1 A. Yes. 2 Q. And were any of those clients 3 corporations? 4 A. Yes. 5 Q. In any of those contracts, did you ever 6 obtain a personal guarantee? 7 A. No. 8 Q. You've said that you met with Mr. Guo 9 in person on three occasions. I believe we've 10 identified – just let me finish my question, 11 because I can see already you're skeptical as to 12 my question already. 13 But you've identified three occasions 14 that you've met with him in person prior to the 15 signing of the contract. Is that – are there 16 any other occasions on which you met with Mr. Guo 17 face-to-face prior to the signing of the 18 contract? 19 A. I don't believe so. They were always 20 in his apartment, and they were always there. 21 Then at one point he actually went downstairs, 22 and we had lunch at Cipriani at a little table, 23 so I don't know if you'd call that outside of the 24 apartment, but that was still in the 25 Sherry-Netherlands.</p>
<p style="text-align: right;">Page 295</p> <p>1 A. I really don't know how to answer that. 2 I worked with a group in London called Bell 3 Pottinger, and then I also, prior to that, I had 4 another firm of my own called Corporate 5 Consulting, and – so that was many, many years 6 ago. 7 Q. And in connection with your work at 8 Bell Pottinger, were you responsible for 9 negotiating or entering into contracts, service 10 contracts? 11 A. I wouldn't call it service. They're 12 client contracts. It would be like a law firm 13 having a client come in and say, I'd like to have 14 you represent us. 15 Q. And were you responsible for 16 negotiating and entering into those types of 17 contracts? 18 A. Yes, in some cases, um-hum. 19 Q. And were any of those contracts with 20 corporations? 21 A. They were with clients of the firms, 22 yes. 23 Q. How about your work as – for Corporate 24 Consulting, were you responsible for negotiating 25 and entering into contracts with clients?</p>	<p style="text-align: right;">Page 297</p> <p>1 So, no, I mean, the best of my ability, 2 I believe it's three. It could have been four, 3 but I think it was three, only three. 4 Q. How about on the telephone, did you 5 ever talk to Mr. Guo on the telephone? 6 A. Not to my knowledge. 7 Q. Did you ever communicate with Mr. Guo 8 via text message? 9 A. Not to my knowledge. It was always 10 done through Yvette. 11 Q. Other than those three, possibly four 12 meetings with Mr. Guo face-to-face, did you have 13 any communication with Mr. Guo at all prior to 14 the signing of the contract? 15 A. Well, there would have been either by 16 email, which we never did, because I didn't even 17 know what his email address was. We had a – he 18 gave me his Signal number. I don't believe I 19 ever had any – any communication with him because, 20 again, we were only going through Lianchao or 21 Yvette. That's the way he wanted it and that's 22 the way we did it. 23 Q. You've talked about this agreement – 24 A. Um-hum. 25 Q. – and the secrecy that it was clouded</p>

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<p style="text-align: right;">Page 298</p> <p>1 in for the protection of the parties, is that a 2 fair statement? 3 A. That's a fair statement. 4 Q. And you, being Strategic, took some 5 steps to maintain the identity of the parties, to 6 keep the identity of the parties secret, is that 7 fair? 8 A. That's correct. 9 Q. And is it – is it one of Strategic's 10 business goals to protect the identities of its 11 clients, generally speaking? 12 A. Yes, because it's generally a private 13 agreement or an arrangement between my clients 14 and myself. 15 Q. And was this agreement different in 16 that regard in any way from your other clients; 17 was there a heightened degree of security or a 18 sense of keeping things – keeping the names of 19 the parties confidential? 20 A. Absolutely – 21 MR. SCHMIDT: Objection. But go ahead. 22 THE WITNESS: Sorry. 23 MR. SCHMIDT: No, that's fine. 24 A. Absolutely. 25 Q. When you learned that Eastern would be</p>	<p style="text-align: right;">Page 300</p> <p>1 A. He represented – Guo represented that 2 he was, in fact, the person that was going to 3 fund this. So I presumed, when Yvette's sitting 4 next to me and having conversations with him, 5 along with – along with all of the conversations 6 that we'd had in his apartment, that obviously 7 it's Guo with whom we are dealing. So Guo equals 8 Eastern, one would presume. Just saying. 9 Q. Did you do any independent research to 10 determine whether or not that was – that Guo 11 equaled Eastern? 12 A. It's – it's so redundant, but, no, we 13 didn't, because he said he was going to fund it, 14 whatever it was, and we did not know the name of 15 the entity that he was going to use. 16 Q. When did he first tell you that it 17 would be an entity and not himself personally 18 that would be the counterparty to the contract? 19 A. Because he said that he had accounts 20 everywhere and that it would probably be through 21 the U.K. office of William Wu or William Yu, or 22 whatever his name was, that was the – his 23 financial person. 24 Q. And when did you find that out; when 25 was the first time?</p>
<p style="text-align: right;">Page 299</p> <p>1 signing the contract on January 6th, the date 2 that you and Yvette executed the contract, did 3 you speak to Mr. Guo at any point thereafter, 4 prior to signing the contract but after learning 5 that Eastern would be the signatory? 6 A. Gosh, I – well, let me see. So she 7 signed it on the – the 6th of January. Then we 8 saw him subsequently during January. So I never 9 had any direct contact with him, it was only 10 through Yvette or Lianchao. So I'm not sure if 11 that answers your question. 12 Q. After finding out that Eastern would be 13 the counterparty to the contract – 14 A. Right. 15 Q. – that's the subject of this 16 litigation, did you talk to Mr. Guo about also 17 signing the contract? 18 A. He represented Eastern, and in all of 19 our conversations he was the only party with whom 20 I negotiated, and Mike negotiated the discussion 21 and the contract. 22 Q. So after finding out that Eastern, not 23 Mr. Guo, would be the counterparty to the 24 contract, did you talk to Mr. Guo about also 25 signing the contract?</p>	<p style="text-align: right;">Page 301</p> <p>1 A. When did I find it out? I mean, we 2 were discussing the payment process and how that 3 would work after looking at the – we had the 4 vision paper, we had the – the Word 5 presentation, we had done another sort of vision 6 paper; all of these were in different discussions 7 with him moving forward. 8 He then said, when we got to sort of 9 the third or fourth discussion of all of this, 10 that he wanted to fund it, and he explained that 11 he paid \$250 million for that, and that he wanted 12 very much to make sure that, if this was done, 13 that we would have a long-term contract for at 14 least three years, and for possibly up to 4,000, 15 quote, fish, and he said that he would fund it, 16 so we presumed he would fund it. We didn't know 17 whether he was Eastern or, as I say, the Mickey 18 Mouse Club. We didn't know. He never told us 19 who it was going to be. 20 Q. But prior to signing the contract – 21 A. Right. 22 Q. – you never asked Mr. Guo to sign it 23 himself? 24 A. No, because he wouldn't. 25 Q. Did you ever ask him?</p>

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<p style="text-align: right;">Page 302</p> <p>1 A. I think we did.</p> <p>2 Q. You did?</p> <p>3 A. I think Mike did.</p> <p>4 Q. When did you ask him?</p> <p>5 A. In the conversations, will you sign the</p> <p>6 – who will be signing the contract? He said,</p> <p>7 Yvette will be signing the contract. And then,</p> <p>8 when Lianchao was there, Lianchao will sign the</p> <p>9 contract. And then there was a conversation</p> <p>10 about whether Lianchao should do it because he's</p> <p>11 with an NGO. And then, long story short, he</p> <p>12 said, no, well, maybe we'll have Yvette sign it.</p> <p>13 That was the last I heard of that.</p> <p>14 Q. Did you ask Mr. Guo to sign it?</p> <p>15 A. Did I personally? Why – why would I?</p> <p>16 Q. I'm having – I feel like I've asked</p> <p>17 the same question a couple of times and I keep –</p> <p>18 A. You have, and so I'm getting very</p> <p>19 frustrated with the answer.</p> <p>20 Q. I need a yes or no. Did you – yes or</p> <p>21 no question. Did you ask Mr. Guo –</p> <p>22 A. I don't remember.</p> <p>23 Q. – to sign the contract?</p> <p>24 A. I don't remember. I –</p> <p>25 Q. Did you hear –</p>	<p style="text-align: right;">Page 304</p> <p>1 Q. How long between the time that you</p> <p>2 found out, on January 6th, that Mr. Guo was not</p> <p>3 personally signing the contract and the time of</p> <p>4 you physically signing the contract?</p> <p>5 MR. SCHMIDT: Objection. But go ahead.</p> <p>6 A. I don't know.</p> <p>7 Q. Ballpark it for me. More than an hour?</p> <p>8 A. I don't know. It never came up.</p> <p>9 Q. You learned on January 6th for the</p> <p>10 first time –</p> <p>11 A. I learned on January 6th that Yvette</p> <p>12 was signing it.</p> <p>13 MR. SCHMIDT: Let her finish.</p> <p>14 A. I'm going to answer your question.</p> <p>15 MS. TESKE: I haven't finished the</p> <p>16 question yet, Joe.</p> <p>17 MR. SCHMIDT: No, no. Let her speak.</p> <p>18 MS. TESKE: I'd like to ask my</p> <p>19 question. There's no question pending. I</p> <p>20 don't know how she's speaking. I just want</p> <p>21 to finish asking my question.</p> <p>22 MR. SCHMIDT: She was going back to</p> <p>23 your original question. Let her speak. Let</p> <p>24 her finish. Go ahead.</p> <p>25 A. Yvette sat on the sofa, she signed the</p>
<p style="text-align: right;">Page 303</p> <p>1 A. – know we discussed it.</p> <p>2 Q. Did you hear Dr. Waller ask Mr. Guo to</p> <p>3 sign the contract?</p> <p>4 A. I don't remember. I don't think so.</p> <p>5 But he said he was going to fund it, so we</p> <p>6 presumed he was going to sign it. There was</p> <p>7 nobody else in the room.</p> <p>8 MR. SCHMIDT: That's fine. There's no</p> <p>9 question pending at this point.</p> <p>10 Q. And when you found out he wasn't going</p> <p>11 to sign it, how long between finding out he</p> <p>12 personally wasn't going to be signing it and you</p> <p>13 signing the contract?</p> <p>14 MR. SCHMIDT: Objection. But go ahead.</p> <p>15 A. That's the wildest question all day.</p> <p>16 Q. Okay, but it just requires an answer</p> <p>17 nonetheless.</p> <p>18 A. It has absolutely no correlation with</p> <p>19 the reality.</p> <p>20 Q. Your opinion on the correlation between</p> <p>21 my question and this litigation is completely</p> <p>22 irrelevant. You're sitting there as the</p> <p>23 deponent. I've asked you a question. Please</p> <p>24 answer my question.</p> <p>25 A. Answer – ask me again then.</p>	<p style="text-align: right;">Page 305</p> <p>1 contract, she had Guo on the phone, to the best</p> <p>2 of my knowledge; it certainly sounded like him,</p> <p>3 she was talking to him, so it sounded like his</p> <p>4 voice on the other end of the phone. Maybe it's</p> <p>5 my imagination. Maybe she had somebody else say,</p> <p>6 let's just go ahead and sign the contract. I</p> <p>7 don't know.</p> <p>8 Q. Are you done? Is that the end of your</p> <p>9 answer?</p> <p>10 A. When you're polite, yes, that's the end</p> <p>11 of my answer, my dear.</p> <p>12 MR. SCHMIDT: Just wait till – wait</p> <p>13 till.</p> <p>14 THE WITNESS: It's a long day.</p> <p>15 MR. SCHMIDT: Wait for the next</p> <p>16 question.</p> <p>17 THE WITNESS: You haven't been sitting</p> <p>18 in this chair.</p> <p>19 MR. SCHMIDT: Wait until the question.</p> <p>20 There's no question.</p> <p>21 THE WITNESS: I'm waiting for it.</p> <p>22 MR. SCHMIDT: Go.</p> <p>23 Q. You found out on January 6th that</p> <p>24 Eastern would be signing the contract. You've</p> <p>25 testified that you believe it was your</p>

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REPORTER'S CERTIFICATE

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STATE OF NEW YORK)

) ss.

COUNTY OF NEW YORK)

I, ROBERTA CAIOLA, a Shorthand Reporter
and Notary Public within and for the State of New
York, do hereby certify:

That FRENCH WALLOP, the witness whose
deposition is hereinbefore set forth, was duly
sworn by me and that such deposition is a true
record of the testimony given by such witness.

I further certify that I am not related
to any of the parties to this action by blood or
marriage and that I am in no way interested in
the outcome of this matter.

In witness whereof, I have hereunto set
my hand on this date, February 21, 2019.

ROBERTA CAIOLA

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